

## NOTICE OF EXEMPTION

**To:** ☒ Office of Planning and Research  
PO Box 3044, Room 113  
Sacramento, CA 95812 – 3044  
state.clearinghouse@opr.ca.gov

☒ County Clerk  
County of Los Angeles  
12400 Imperial Hwy  
Norwalk, CA 90650

**From:** County of Los Angeles  
Department of Health Services  
238 E. 6<sup>th</sup> Street  
Los Angeles, CA 90014

**PROJECT TITLE:** Safe Landing – West Athens

**PROJECT LOCATION -- Specific:** 1328 West Imperial Highway, Los Angeles, CA 90044

**PROJECT LOCATION – City:** Unincorporated Los Angeles County

**PROJECT LOCATION – County:** Los Angeles

**DESCRIPTION OF NATURE, PURPOSE, AND BENEFICIARIES OF PROJECT:** On January 29, 2019 the Los Angeles County Board of Supervisors authorized the Los Angeles County Department of Health Services (DHS) and Chief Executive Officer to allocate funding for construction of the proposed project and to enter in to a lease with a non-profit who will construct and operate the project. The proposed project consists of construction of interim housing (with accommodations for up to approximately 320 people) and associated intake clinic, dining, administration, chapel and security on a 118,500 square foot [sf] (2.72-acre) county-owned, currently vacant site. Interim housing is a form of homeless shelter that provides temporary housing for the homeless to bridge the gap between living on the street and more permanent forms of housing. The project would be comprised of six main prefabricated buildings (each about 28 feet tall): Intake Building -- includes intake/waiting area, sobering beds (11 men, 7 women), psychiatric beds (23 men, 15 women), examination, isolation/calming/flexible rooms, nurses station, security station, staff room, small kitchen, small dining/lounge); Women's Residential Building -- 96 beds; Couples Residential Building -- 32 beds, accommodations for 64 people; Administration/Dining Building -- includes administration offices, kitchen, dining area, laundry; Men's Residential Buildings (two) – accommodations for 2 x 80 beds = 160 beds. The total occupiable area of the project within all buildings would be approximately 54,000 sf, of which approximately 37,000 sf would be for residential use and the remainder for associated administration and clinic uses. The project would also include a kennel and dog run. The 60 beds in the Intake Building would be used as individuals transition to the residential portion of the project. Exterior improvements include landscaped/open space areas between the buildings (including possibly a half basketball court), security structure (approximately 800 sf), a small chapel (300 sf), security/decorative lighting, surface parking (63 spaces); an approximately 6-foot tall, solid fence would enclose the site. Construction would take about 10 months and require up to 100 workers. Construction staging would occur on the southern portion of the site.

**NAME OF PUBLIC AGENCY APPROVING PROJECT:** County of Los Angeles County

**NAME OF PERSON OR AGENCY CARRYING OUT PROJECT:** County of Los Angeles through the Los Angeles County, Department of Health Services (DHS)

**EXEMPT STATUS:**

- ☐ Ministerial (Sec. 21080(b)91); 15268).  
☐ Declared Emergency (Sec 21080(b)(3); 15269(a))  
☒ Emergency Project (Sec 21080(b)(4); 15269(c))  
☐ Categorical Exemption:  
☒ Statutory Exemption. (Sec 21159.25) AB 1804. Unincorporated County Infill Mixed-Use Residential

**REASONS WHY PROJECT IS EXEMPT:** See attachment which is incorporated herein.

**LEAD AGENCY CONTACT PERSON:** Cheri Todoroff, Director, Housing for Health, Los Angeles County Department of Health Services      **Telephone:** (213) 833-5350

**IF FILED BY APPLICANT:** Not Applicable

1. Attach certified document of exemption finding.  
 2. Has a notice of exemption been filed by the public agency approving the project?    ☐ Yes                      ☐ No

Signature: \_\_\_\_\_ Date: \_\_\_\_\_ Title: Director, Housing for Health, DHS

☒ Signed by Lead Agency

Date Received for Filing at OPR: \_\_\_\_\_

☐ Signed by Applicant

## **Safe Landing – West Athens, 1328 W. Imperial Highway Summary of Reasons Why Project is Exempt Attachment**

Detailed documentation of each of the applicable exemptions is available for review at Department of Health Services, 238 E. 6<sup>th</sup> Street, Los Angeles, CA 90014. A summary of this documentation is provided below.

### ***Public Resources Code Section 21159.25 – Unincorporated County Infill Residential or Mixed-Use Housing Projects***

The project is a mixed-use residential housing project (residential in the form of a shelter and administration/clinic). The project site is surrounded with qualified urban uses (residential and public institutional uses).

The project is an allowable use within the C-2 Neighborhood Commercial/ Business designation and with all applicable general plan policies and zoning regulations (Planning Director's review and approval is required). The residential density of the project would be not less than the density of adjacent residential property (24 units/acre) and would be more than residential property within 1,500 feet (which is mostly single-family residential) and would contain more than six residential units. The project site is within an unincorporated area of Los Angeles County, is 118,500 square foot (less than 5 acres) and is surrounded by qualified urban uses. The site is vacant with remnant asphalt from a parking lot, hard packed dirt and few remaining ornamental trees and shrubs; there is no habitat on the site for threatened or endangered species. The project would not have the potential to significantly impact traffic, noise, air quality, greenhouse gas emissions or water quality based on proposed site improvements and proposed occupancy. Typical construction techniques for construction of pre-fabricated buildings would be used that would be required to comply with applicable regulations including Low Impact Development (LID) and the LA County Noise Ordinance. The site is located in an urban area well-served by utilities and public services. The site is on a legal parcel within the boundaries of the Los Angeles-Long Beach-Anaheim urbanized area as designated by the United States Census Bureau.

Based on the record the County has determined the following: (1) the project would not create significant cumulative impacts by contributing to impacts of successive projects of the same type in the same place; (2) there is not a reasonable possibility that the project could result in a significant effect on the environment due to unusual circumstances; (3) the project would not result in damage to scenic resource; (4) the site is not on a site included on any list compiled pursuant to Section 65962.5 of the Government Code; (5) the site is currently vacant and mostly paved and has been substantially disturbed by past uses; there are no known historic resources on the site or in the vicinity and therefore the project has no potential to result in a substantial change to the significance of an historic resource.

### ***Public Resources Code Section 21080(b)(4), State CEQA Guidelines Section 15269(c) -- Emergency Project***

Homelessness in the City and County of Los Angeles experienced a large increase from 2016 to 2017. The County's total homeless population increased to over 55,000 in 2017 up from 46,874 in 2016. During the same time period homeless youth (under the age of 24) increased 61% (to nearly 6,000). In the City of Los Angeles, the homeless population increased 23% from 2016 to 2017. April 17, 2018 Mayor Eric Garcetti declared a shelter crisis to provide emergency housing for some of the estimated 25,237 unsheltered homeless people in the City of Los Angeles. October 30, 2018, LA County Board of Supervisors declared a shelter crisis to address homelessness in unincorporated LA County (estimated to be more than 5,000 people). This project would provide service essential to public health, safety and welfare by mitigating the emergency conditions associated with the shelter crisis.

## EXEMPTION DOCUMENTATION SAFE LANDING – WEST ATHENS PROJECT 1328 W. IMPERIAL HIGHWAY

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### 1. PROJECT DESCRIPTION (NATURE, PURPOSE, BENEFICIARIES)

#### *Existing Uses*

The 118,500 square foot [sf] (2.72-acre) county-owned project site is currently vacant. **Figure 1** shows an aerial view of the project site and area.

#### *Proposed Improvements*

The proposed project consists of construction of interim housing. Interim housing is a form of homeless shelter that provides temporary housing for the homeless to bridge the gap between living on the street and more permanent forms of housing. The project would provide accommodations for up to approximately 320 people plus 60 intake beds, and would include an associated intake clinic, dining facilities, administration, chapel and security. The proposed project would be called “Safe Landing – West Athens.”

The project would be comprised of six main prefabricated buildings (each about 28 feet tall). Allocation of uses is anticipated to be as follows, minor variations in uses and areas could occur during final design:

- Intake Building (12,900 square feet) -- includes intake/waiting area, sobering beds (12 men, 8 women), psychiatric beds (24 men, 16 women), examination, isolation/calming/flexible rooms, nurses' station, security station, staff room, small kitchen, small dining/lounge; the 60 sobering/psychiatric beds in the Intake Building would be used as people transition to the residential portion of the project.
- Women's Residential Building (7,500 square feet) -- 96 beds;
- Couples Residential Building (7,500 square feet) -- 32 beds, accommodations for 64 people;
- Administration/Dining Building (9,730 square feet) -- includes administration offices, kitchen, dining area, laundry, plus 2,500 square feet of exterior dining;
- Men's Residential Buildings (two 7,500 square foot buildings) -- accommodations for 2 buildings x 80 beds = 160 beds.

The project would also include a kennel and dog run. The total occupiable area of the project within all buildings would be approximately 54,000 sf, of which 37,000 sf would be for residential use and the remainder for associated administration and clinic uses.

Exterior improvements would include landscaped/open space areas between the buildings (including possibly a half basketball court), a security structure (790 sf), a small chapel (300 sf), decorative lighting, and parking (63 spaces); a 6-foot tall, solid fence would enclose the site.

**Figure 2** shows a preliminary site plan.

#### *Construction*

Total construction is anticipated to take approximately 10 months and would require up to 100 workers during peak months. It is reasonably anticipated that there would be no soil export or import.

Construction staging would occur on the southern portion of the site. Construction would occur in three basic stages:

- Site clearance, excavation and grading (as well as pile drilling if needed) would take approximately 1.5 months and would require two tractor scrapers, one loader or grader, one backhoe and one water truck; if piles are needed a drill rig and another backhoe would be needed.
- Building assembly/construction, would take about nine months (overlapping with grading for two weeks to start) and would require two forklifts, two cranes and two portable generators. Additional activity during building construction would include use of hand trade tools, concrete delivery, use of portable rigs such as for concrete installation, welding, delivery/supply trucks, etc. Structures would be assembled from prefabricated previously painted components so limited if any painting would occur on-site.
- Paving and landscaping would overlap with the last 2.5 months of building construction and would use one backhoe, one machine paver and a steam roller.

### *Operational Characteristics*

The proposed shelter would operate 24 hours a day, accommodating up to approximately 320 people (men and women), and would be staffed in shifts. There would be three typical shifts for shelter employees, with 73 during the day shift (7 am to 4 pm), 59 during the evening shift (3 pm to midnight), and 58 during the night shift (11 pm to 8 am).

Safe Landing – West Athens would provide interim housing that is open 24/7 for homeless walk-ins and drop-offs. The intake area would provide health and behavioral health triage. Specialty interim housing beds would be available for individuals with complex needs (such as those associated with drug, alcohol and mental health issues). General interim housing beds would be available for homeless people who do not need the specialty services. Safe Landing – West Athens would provide support to assist homeless people in transitioning to Permanent Supportive Housing (PSH) and other stable options off the street.

The project would include accommodations for animals and a dog run as well as open space including possibly exercise areas.

Individual residents are anticipated to transition to PSH or other housing options. The shelter is intended to provide housing for men and women, but not families with children. Families with children would not be accommodated at this location.

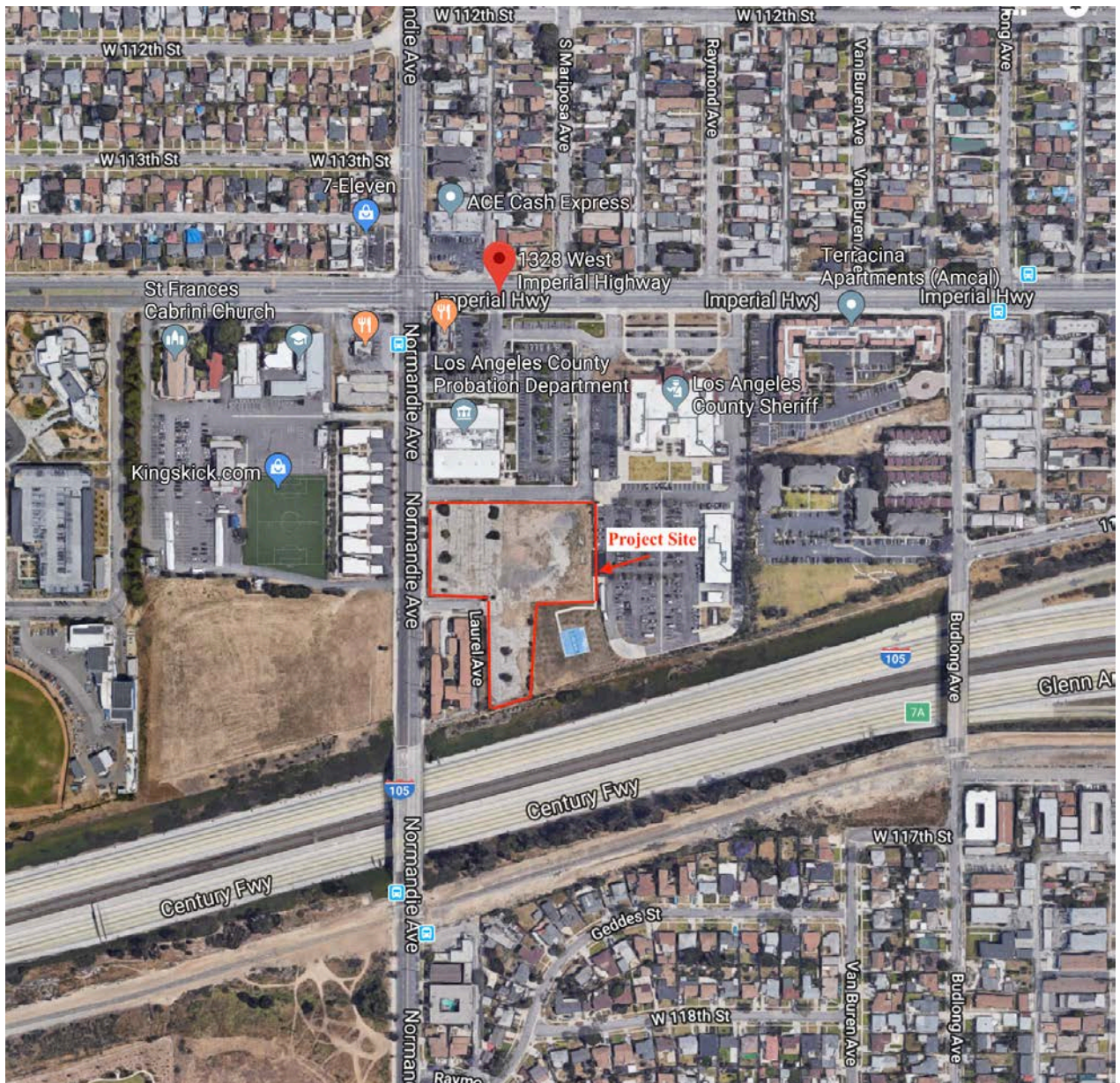
The project would generate approximately 406 daily weekday vehicle trips, including 38 a.m. peak hour trips and 38 p.m. peak hour trips based on a traffic report prepared by KOA traffic engineers (Attachment A – Traffic Review). If the 60 sobering/psychiatric beds were all fully occupied in addition to all the shelter beds (which is not anticipated), the project would generate 483 daily trips and 46 a.m. and p.m. peak hour trips.

Safe Landing – West Athens would have monitored entrances and exits and 24/7 on-site security services including security guards stationed at the entrance and within the facility. Everyone would enter through the security area. Security staff are specially trained with customized protocols for managing people who could be potentially harmful to themselves or others (including available isolation space, etc.). Clients would pass through unobtrusive metal detectors or would be patted down/bags searched (for clients who cannot go through metal detectors). Security staffing would be as follows 4 daytime, 3 evening and 2 overnight.



*Discretionary Actions*

The County of Los Angeles Department of Health Services (DHS) proposes to construct the project and fund ongoing operations. The LA County Regional Planning Director would review and approve the project (Planning Department site plan review). A non-profit organization would lease the site from the County and would construct and operate the shelter.



**Figure 1: Aerial View of Project Site and Area**

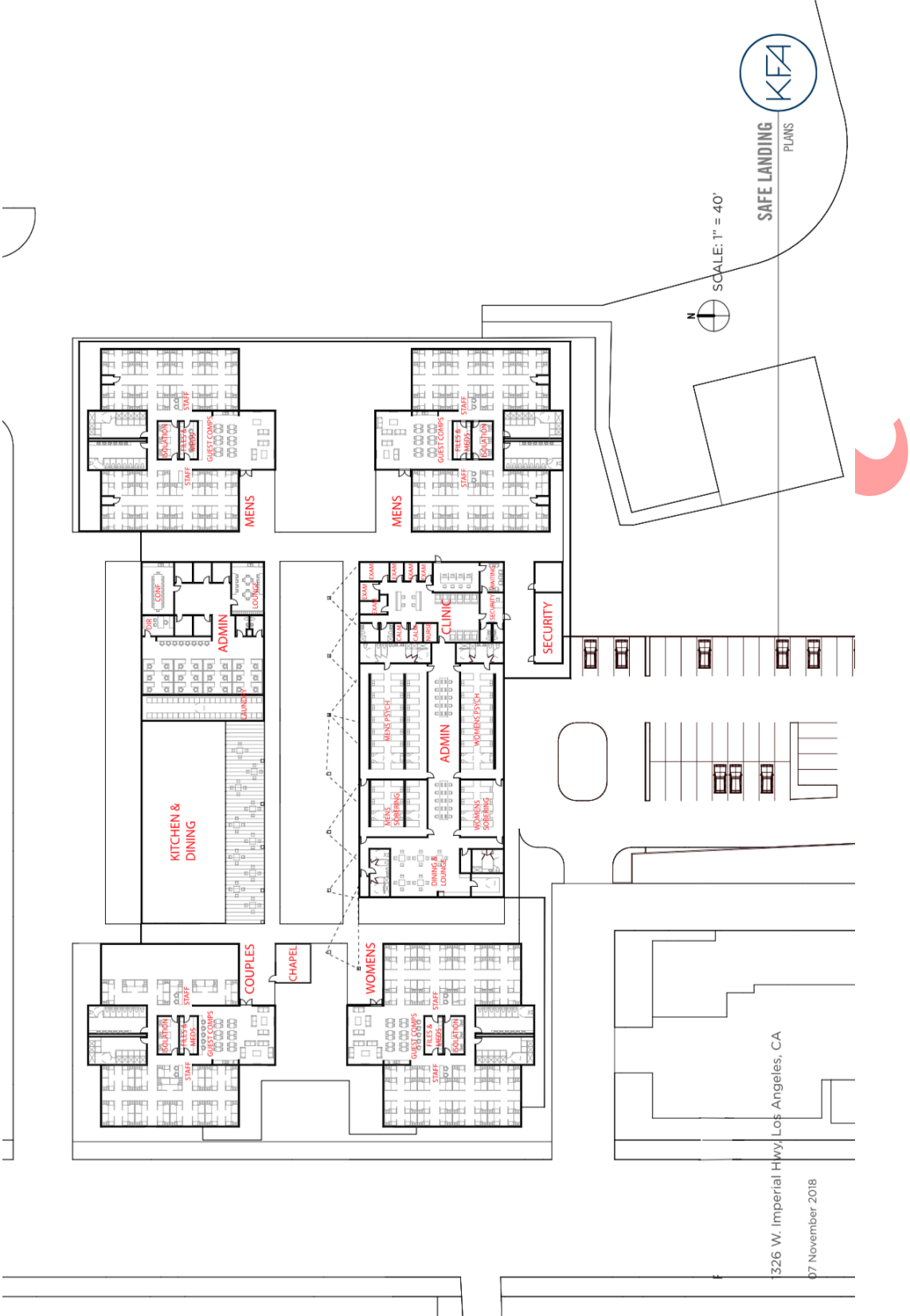


Figure 2: Proposed Site Plan

## 2. CEQA EXEMPTIONS AND PROJECT ANALYSIS

### Unincorporated County Infill Residential or Mixed-Use Housing Projects Exemption (Statutory)

AB 1804 adds a new exemption (Public Resources Code Section 21159.25) similar to the Class 32 Infill Categorical Exemption (CEQA Guidelines Section 15332), that includes residential and mixed-use projects in unincorporated areas of counties subject to certain conditions. This exemption is a statutory exemption for projects that meet the criteria (see below).

Public Resources Code Section 21159.25, added by AB 1804 as of January 1, 2019 identifies the Exemption as follows:

*21159.25.*

*(a) For purposes of this section, the following definitions apply:*

- (1) "Residential or mixed-use housing project" means a project consisting of multifamily residential uses only or a mix of multifamily residential and nonresidential uses, with at least two-thirds of the square footage of the development designated for residential use.*
- (2) "Substantially surrounded" means at least 75 percent of the perimeter of the project site adjoins, or is separated only by an improved public right-of-way from, parcels that are developed with qualified urban uses. The remainder of the perimeter of the site adjoins, or is separated only by an improved public right-of-way from, parcels that have been designated for qualified urban uses in a zoning, community plan, or general plan for which an environmental impact report was certified.*

*(b) Without limiting any other statutory exemption or categorical exemption, this division does not apply to a residential or mixed-use housing project if all of the following conditions described in this section are met:*

- (1) The project is consistent with the applicable general plan designation and all applicable general plan policies as well as with applicable zoning designation and regulations.*
- (2) (A) The public agency approving or carrying out the project determines, based upon substantial evidence, that the density of the residential portion of the project is not less than the greater of the following:*
  - (i) The average density of the residential properties that adjoin, or are separated only by an improved public right-of-way from, the perimeter of the project site, if any.*
  - (ii) The average density of the residential properties within 1,500 feet of the project site.*
  - (iii) Six dwelling units per acre.**(B) The residential portion of the project is a multifamily housing development that contains six or more residential units.*
- (3) The proposed development occurs within an unincorporated area of a county on a project site of no more than five acres substantially surrounded by qualified urban uses.*
- (4) The project site has no value as habitat for endangered, rare, or threatened species.*
- (5) Approval of the project would not result in any significant effects relating to transportation, noise, air quality, greenhouse gas emissions, or water quality.*
- (6) The site can be adequately served by all required utilities and public services.*
- (7) The project is located on a site that is a legal parcel or parcels wholly within the boundaries of an urbanized area or urban cluster, as designated by the United States Census Bureau.*



*(c) Subdivision (b) does not apply to a residential or mixed-use housing project if any of the following conditions exist:*

- (1) The cumulative impact of successive projects of the same type in the same place, over time is significant.*
- (2) There is a reasonable possibility that the project will have a significant effect on the environment due to unusual circumstances.*
- (3) The project may result in damage to scenic resources, including, but not limited to, trees, historic buildings, rock outcroppings, or similar resources, within a highway officially designated as a state scenic highway.*
- (4) The project is located on a site which is included on any list compiled pursuant to Section 65962.5 of the Government Code.*
- (5) The project may cause a substantial adverse change in the significance of a historical resource.*

*(d) If the lead agency determines that a project is not subject to this division pursuant to this section and it determines to approve or carry out the project, the lead agency shall file a notice with the Office of Planning and Research and with the county clerk in the county in which the project will be located in the manner specified in subdivisions (b) and (c) of Section 21152.*

*(e) This section shall remain in effect only until January 1, 2025, and as of that date is repealed.*

### **Project Analysis**

The Safe Landing – West Athens Project meets all of the criteria of Public Resources Code section 21159.25, as demonstrated below.

### **Definitions [Section 21159.25(a)]**

(1) The project is a mixed-use residential project, including interim housing and an associated clinic. Of the approximately 54,000 square feet of building area (all one-story buildings), approximately 37,000 square feet would consist of residential uses (i.e., approximately 70% of the building area would be designated residential).

(2) The project site is completely surrounded by qualified urban uses (residential and public institutional uses) or separated from such uses by an improved public right-of-way. The project is bounded by Normandie Avenue to the west with multi-family residential uses beyond, the Century (105) Freeway to the south with single-family residential uses beyond, the Los Angeles County Probation Department LA County Sheriff and associated parking to the north and east.

### **Consistency with General Plan and Zoning [Section 21159.25(b)(1)]**

The project is consistent with the C-2 Neighborhood Commercial/Business designation and with all applicable general plan policies and zoning regulations. In the C-2 zone Planning Director's ministerial site plan review and approval is required for homeless shelters. This means that the project will be required to comply with Section 22.140.300 of the LA County Code requires that there not be an over-concentration of homeless shelters in an area, that the land uses in the immediate vicinity of the site not constitute an immediate or potential hazard to occupants, that parking be sufficient to mitigate any adverse impacts on the surrounding area and that the shelter meet Title 25 (Housing and Community) of the California Code of regulations regarding shelters.



The project is within the West Athens-Westmont Community Plan and the West Athens-Westmont Community Standards District (CSD) (LA County Code Section 22.44.120). Maximum allowed height within the CSD is 40 feet; the project would be 28 feet. Responding to policies within the CSD, the project would be a residential use that would be of attractive design and would provide a safe environment for residents that would not affect existing residential neighborhoods.

***(b)(2) Project Density, Residential Units [Section 21159.25(b)(2)]***

The density of the residential portion of the project (as currently designed, approximately 37,000 square feet of the site would be used for residential use with the remainder used for clinic, administration, open space, parking, security, chapel) would be not less than the density of adjoining residential property (24 units/acre<sup>1</sup>). Property within 1,500 feet of the site includes substantial amounts of single-family property and that density is less than the density of the adjacent residential property. The project would contain more than six residential units.

***Unincorporated County, Site Size [Section 21159.25(b)(3)]***

The 118,500 square foot site (2.72 acres) is located in unincorporated Los Angeles County and is surrounded by qualified urban uses (residential and public institutional uses).

***On-Site Habitat [Section 21159.25(b)(4)]***

The project site is urban in nature and is surrounded by urban uses and has no value as habitat for endangered, rare or threatened species.<sup>2</sup> There are several small remaining ornamental trees/bushes left over from previous landscaping of prior surface parking use on the site. These trees/bushes would be removed by the proposed project. The project site does not provide habitat for protected species other than nesting habitat for birds. In general birds are nesting during the period February 1 through August 31. Over 900 species of migratory birds are protected under the Federal Migratory Bird Treaty Act (MBTA) (Title 33, United States Code, Section 703 et seq., see also Title 50, Code of Federal Regulation, Part 10) and Section 3503 of the California Department of Fish and Game Code protects nests of all birds (except English sparrows and European starlings). These regulations ensure protection of nesting birds.

***Traffic [Section 21159.25(b)(5)]***

A review of project trip generation and potential traffic impacts of the project was undertaken.<sup>3</sup> The proposed project would generate approximately 406 daily weekday vehicle trips, including 38 a.m. peak hour trips and 38 p.m. peak hour trips. If the 60 sobering/psychiatric beds were all fully occupied in addition to all the shelter beds (which is not anticipated), the project would generate 483 daily trips and 46 a.m. and p.m. peak hour trips. The County of Los Angeles Department of Public Works (DPW) minimum standard requirement for traffic studies, based on the potential for adverse impact, is 500 or more daily trips. Therefore, a traffic impact study is not required by County DPW for this project and significant impacts to traffic would not occur. Additionally, the project is within a Transit Priority Area (TPA) with multiple transit opportunities in proximity to the site including two high-frequency bus lines that share stops adjacent to the project site (meeting the definition for a major transit stop under Public Resources Code Section 21064.3). The State Office of Planning and Research has recently issued guidance with

<sup>1</sup> Adjacent Site: 11530 S Normandie Ave, 22 units on 33,338 square foot site = 28 units/acre.  
HACOLA project across street, 11431-11463 S Normandie Ave, 28 units on 60,007 square foot site = 20 units/acre  
Average = 24 units/acre

<sup>2</sup> Biological Resources Review, 1328 W. Imperial Highway, Biological Assessment Services, January 15, 2019. See Attachment B.

<sup>3</sup> Traffic Review 1328 West Imperial Highway, South Los Angeles, KOA Corporation, November 2, 2018. See Attachment A.

respect to how to evaluate transportation impacts.<sup>4</sup> As indicated in that guidance, CEQA Guideline Section 15064.3 (b)(1), indicates that lead agencies generally should presume that projects (including residential, retail, and office projects, as well as projects that are a mix of these uses) proposed within 1/2 mile of an existing major transit stop or an existing stop along a high quality transit corridor should be presumed to cause a less than significant impact on transportation. The guidance also provides that adding affordable residential development in infill locations generally improves job-housing match, in turn shortening commutes and reducing vehicle miles travelled (VMT). It is anticipated that project residents and employees would make substantial use of transit. Therefore, the project would not have a significant impact on traffic and transportation.

#### ***Air Quality and Greenhouse Gas Emissions [Section 21159.25(b)(5)]***

The City of Los Angeles has undertaken air quality modeling of a variety of projects and has issued guidance indicating that projects with less than 80 residential units or 75,000 square feet of non-residential area and less than 20,000 cubic yards of soil export are not expected to result in significant construction or operational emissions/air quality impacts. While the project is not located in the City of Los Angeles it is located in the same air basin and same context for development. The County has evaluated this guidance and has determined that for these reasons, this guidance would apply to this project.

Construction and daily operations of the proposed shelter use would be less than those associated with construction and operation of 80 market rate residential units or 75,000 square feet of non-residential use. Construction emissions would be associated with grading to prepare the site, construction/assembling the pre-fabricated buildings and emissions from construction worker vehicles, paints and glues and off-gassing of any carpeting. Operational impacts would be associated with automobile use (406 trips per day). Given that the project size is less than projects that have the potential to result in significant air quality impacts, no air quality modeling is necessary, and impacts would be less than significant.

The project would be a community-serving use, in an infill urban location near transit, and would incorporate LEED certified elements and would comply with applicable CALGreen (the California Green Building standards). By providing this community service including interim housing in close proximity to transit the project would facilitate transit use and thereby minimize VMT and associated greenhouse gas emissions. The project would therefore be consistent with local and statewide goals and policies aimed at reducing the generation of GHGs, including SB 375 and CARB's AB 32 Scoping Plan aimed at achieving 1990 GHG emission levels by 2020. The project's generation of GHG emissions would be less than significant and would not make a cumulatively considerable contribution to overall cumulative GHG emissions.

#### ***Noise [Section 21159.25(b)(5)]***

Noise levels on the project site are dominated by the I-105 Freeway. At 50 feet from the freeway (the closest part of the site) noise levels are about 88 dBA Ldn.<sup>5</sup> The closest sensitive receptor is the multi-family residential use located west of the project site (11530 Normandie Avenue) across a small alley (about 50 feet from the portion of the site to be used for parking); this receptor is also about 50 feet from the I-105 freeway. Additional multi-family units are located across Normandie Avenue (about 140 feet) from the project site. The greatest impact would occur during 1.5 months of site preparation/grading and caisson drilling (if needed) when heavy equipment is used to make the site ready for the prefabricated buildings. Such equipment would be audible at the adjacent sensitive receptor above the loud hum of the

<sup>4</sup> Office of Planning and research, Technical Advisory, On Evaluating Transportation Impacts in CEQA, December 2018

<sup>5</sup> Draft EIR Connect Southwest LA: A TOD Specific Plan for Athens-Westmont, Los Angeles County Department of Regional Planning, May 2018. See Table 5.8-13 page 5.8-18. This EIR is a programmatic document that includes the project site. It is available at the following locations: [http://planning.lacounty.gov/assets/upl/project/southwest\\_deir.pdf](http://planning.lacounty.gov/assets/upl/project/southwest_deir.pdf)

adjacent freeway. Assembling/construction of the prefabricated buildings (over approximately 9 months) and the associated equipment (forklifts, cranes, generators, delivery vehicles, and pavers in the last 2.5 months) could also be audible above the hum of the freeway but would become less as the buildings being constructed partially shield the noise sources.

The project would comply with County requirements with respect to noise. The County has established noise standards to control unnecessary, excessive and annoying noise. The standards are codified in Chapter 12.08 (Noise Control) of the Los Angeles County Code. The County Code states that no person shall operate or cause to be operated, any source of sound at any location within the unincorporated county or allow the creation of any noise on property owned, leased, occupied or otherwise controlled by such person which causes the noise level, when measured on any other property either incorporated or unincorporated, to exceed specified standards.

The County's construction noise standards are listed in Section 12.08.440 (Construction Noise) of the County Code. That Section states that, "operating or causing the operation of any tools or equipment used in construction, drilling, repair, alteration or demolition work between weekday hours of 7:00 p.m. and 7:00 a.m., or at any time on Sundays or holidays, such that the sound therefrom creates a noise disturbance across a residential or commercial real-property line, except for emergency work of public service utilities or by variance issued by the health officer is prohibited." Section 12.08.440 of the County Code includes construction noise limits based on the duration of equipment use (i.e., short- or long-term), type of land use, (i.e., single-family residential, multi-family residential, or semi-residential/commercial) and the time period (e.g., daytime or nighttime). Construction activity associated with a development project that occurs for more than 10 days falls under the scheduled and relatively long-term operation of stationary equipment. The daytime construction noise limit is 60 dBA at single-family residences, 65 dBA at multi-family residences, and 70 dBA at semi-residential/commercial areas.

Access to the project would be from Normandie Avenue and Imperial Highway which are not residential streets; traffic added to these roadways would not be substantial (406 trips /day; 38 trips during morning and afternoon peak hours) and therefore would not generate a significant increase in noise. Operation of the shelter, including vehicular operation, noise from outdoor conversations/recreation and barking dogs would result in noise levels less than or similar to those associated with the existing uses in the area.

By complying with all existing regulations governing both construction and operational noise, impacts would be less than significant.

#### ***Water Quality [Section 21159.25(b)(5)]***

Construction activities would include maintenance/operation of construction equipment and handling/storage/disposal of materials that could contribute to pollutant loading in storm water runoff.

The proposed project would comply with all applicable regulations with regard to surface water quality including the LA County Code.

Chapter 12.84 of the LA County Code requires the use of Low Impact Development (LID) principles in development projects. LID encourages site sustainability and smart growth in a manner that respects and preserves the characteristics of the County's watersheds, drainage paths, water supplies and natural resources. LID builds on conventional design strategies by using every softscape and hardscape surface in the development to perform a beneficial hydrologic function by retaining, detaining, storing, changing the timing of, or filtering stormwater and urban runoff. LID encompasses the use of structural devices, engineered systems, vegetated natural designs, and education in order to distribute stormwater and urban runoff across a development site. Over the past decade, LID has emerged along with technologies and

practices that allow a sustainable stormwater management strategy to control stormwater and urban runoff at the source rather than centralized, end-of-pipe controls, LID relies on an integrated system of decentralized, small-scale control measures. These measures range from site design practices to technology driven LID BMPs. LID attempts to offset the effects of development and changes in land cover by preserving or restoring predevelopment hydrology and water quality through a series of small-scale, decentralized, natural, and engineered controls at or near the point where the stormwater is generated. It is a source control option that minimizes stormwater pollution by recognizing the greatest efficiencies are gained by minimizing stormwater generation. This is a process that begins with functional conservation of watershed resources, reducing impacts of development, and then using innovative management practices to meet the stormwater objective. Site preservation practices coupled with small-scale BMPs that rely on the environmental services of vegetation and soils or systems that mimic these services comprise the control approach of LID. These practices, taken in aggregate, limit the observed hydromodification on a developed site and present a more comprehensive and beneficial control approach. To appropriately implement LID, it is important to assess its role in water quality protection. LID is one part of a toolkit that can be used to better manage natural resources and limit the pollution delivered to waterways. It is not independent of watershed planning. To gain optimal benefits, LID must be integrated with appropriate land use programs. LID, by itself, will not deliver the water quality outcomes desired; yet, it provides enhanced stormwater treatment and mitigates excess volume and flow rates. However, if not integrated in a comprehensive fashion, LID techniques can end up as a series of uncoordinated innovative BMPs that have limited water quality benefits. BMPs include minimizing and disconnecting impervious surfaces and maximizing infiltration by various means.

Section 12.80 of the County Code protects the health and safety of the residents of the County by protecting the beneficial uses, marine habitats, and ecosystems of receiving waters within the County from pollutants carried by stormwater and non-stormwater discharges. The intent of this section is to enhance and protect the water quality of the receiving waters of the County and the United States. Section 12.80 applies to the discharge, deposit, and disposal of any stormwater and/or runoff to the storm drain system and/or receiving waters within any unincorporated area covered by a NPDES municipal stormwater permit.

The project would be connected to existing storm water infrastructure and therefore, through this and with compliance with existing regulations, impacts to water quality would be less than significant.

***Public Services and Utilities [Section 21159.25 (b)(6)]***

The project residents are already in the community and are included within community population assumptions and the project would be consistent with land use planning for the project area. The project would result in relatively low levels of demand for water, electricity and natural gas compared to the community in general and therefore would not have a significant impact on these utilities. Similarly, the project would generate relatively low levels of wastewater and solid waste that would not be substantial in the context of the existing community. The project would not include new development reaching any threshold likely to generate significant demand for public services or utilities. Therefore, impacts would be less than significant.

The closest LA County Fire Department (LACFD) station is Station 14 located at 1401 W. 108<sup>th</sup> Street about 3,300 feet to the north of the site. The project would comply with all applicable provisions of applicable Fire and Building Codes. The project would include supplemental fire protection devices, such as fire alarms, fire extinguishers, emergency exits, and any necessary improvements required by the LACFD, would be included in the project design. The project would include on-site security that would reduce impacts to the local police protection/LA County Sheriff to a less than significant level. The closest sheriff station is immediately northeast of the site.



The project would not impact school facilities as all residents would be temporary and would not house families with children. Therefore, a less-than-significant impact relative to school services would occur with the proposed project. The project would temporarily house people who are already in the general area and who do not in general have a high demand for parks and recreational facilities; therefore, the project would not have the potential to result in a significant impact on parks and recreational facilities.

***Urbanized Area [Section 21159.25(b)(7)]***

The project is located on a legal parcel owned by the County of Los Angeles. The site is wholly within the boundaries of the Los Angeles-Long Beach-Anaheim urbanized area as designated by the United States Census Bureau.<sup>6</sup> The project site is located within the West Athens Census Designated Place.

***Cumulative Impacts [Section 21159.25(c)(1)]***

Cumulative projects within 1.5 miles of the project site are identified on **Figure 3** below and listed in **Table 1** below. A radius of 1.5 miles was selected to identify all projects with the potential to result in overlapping impacts. The radius for identifying cumulative projects is typically determined by the potential for overlapping traffic impacts. All cumulative projects are more than 1,800 feet from the project site. There are no cumulative projects in the immediate vicinity of the project. As discussed below, for areas other than traffic there are no cumulative projects with the potential to result in substantial overlapping impacts and therefore there is no potential for the project to result in a cumulatively considerable contribution to a significant impact.

Due to the construction and operational characteristics of the shelter, and distance to the nearest potential cumulative project, the project would not have the potential to create significant cumulative impacts by contributing to impacts of successive projects of the same type in the same place.

The threshold of significance for a cumulatively considerable contribution to a traffic impact is the same as the threshold of significance for a project impact. As discussed above, the project would not have the potential to result in a significant traffic impact and therefore would not have the potential to result in a considerable contribution to a cumulative traffic impact. The same is true for air quality thresholds of significance; the project does not have the potential to result in a project-specific significant air quality impact and therefore does not have the potential to result in a cumulatively considerable contribution to a significant air quality impact.

The project would result in six main buildings, each about 28 feet tall which would be similar to the height of buildings in the area. Residential infill projects within TPAs are not required to analyze aesthetic impacts under CEQA (CEQA Section 21099(d)(1)). The project would be constructed in a heavily urbanized area on a site that is already disturbed, substantially impermeable and would be in character with surrounding development and therefore would have minor if any impact on biological resources, hazards/hazardous wastes, hydrology and land use. Impacts in these issue areas are localized to the site and immediate vicinity (generally within 1,000 feet) and therefore project impacts would not have the potential to combine with impacts of other cumulative projects to significantly impact these issue areas. The closest cumulative project is approximately 1,800 feet (to the northeast) from the site and there would be no potential for overlapping impacts in these issue areas.

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<sup>6</sup> [https://www2.census.gov/geo/maps/dc10map/UAUC\\_RefMap/ua/ua51445\\_los\\_angeles--long\\_beach--anaheim\\_ca/DC10UA51445.pdf](https://www2.census.gov/geo/maps/dc10map/UAUC_RefMap/ua/ua51445_los_angeles--long_beach--anaheim_ca/DC10UA51445.pdf)

The project is a vacant site that has been previously disturbed to a depth of more than 20 feet and does not contain any known historic resources and therefore there would be no potential to impact historic resources.<sup>7</sup> The proposed project would not result in disturbance below previously disturbed levels.

The project would result in ground disturbance to prepare the site for the prefabricated buildings, but it is not anticipated that soil below previously disturbed levels would be impacted and therefore there would be limited/negligible potential to impact geology/soils, archaeological resources, paleontological resources or human remains. Therefore, project impacts would have no potential to combine with impacts of cumulative projects to create significant impacts on geology/soils or cultural resources.

Draft

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<sup>7</sup> Draft EIR Connect Southwest LA: A TOD Specific Plan for Athens-Westmont, Los Angeles County Department of Regional Planning, May 2018. See Sections 4.3.4 Cultural and Tribal Resources (pages 4-6 and 4-9) and Section 5.3 Cultural Resources (starting at page 5.3-1). This EIR is a programmatic document that includes the project site. It is available at the following locations: [http://planning.lacounty.gov/assets/upl/project/southwest\\_deir.pdf](http://planning.lacounty.gov/assets/upl/project/southwest_deir.pdf)



Figure 3 Cumulative Projects Locations

Table 1 Cumulative Projects List	
Land Use	Address
13,000 sf shopping mall expansion	2616 W. Imperial Highway, Inglewood
275 student charter middle school	10045 S. Western Avenue, Los Angeles
Gas station	10000 S. Vermont Avenue, Los Angeles
Gas station	505 W. Century Boulevard, Los Angeles
Gas station, with convenience store	11408 S. New Hampshire Avenue, unincorporated LA County
Addition to commercial medical clinic	9621 S. Vermont Avenue, unincorporated LA County
250 sf Commercial, 1 dwelling	10401 S. Vermont Avenue, unincorporated LA County
74 affordable senior housing units	1252 W 105 <sup>th</sup> Street, unincorporated LA County
11,662 sf school	11130 S. Western Avenue, unincorporated LA County
39 affordable housing units for families/at-risk youth	1743 Imperial Highway, unincorporated LA County
10 apartment units	1539 102 <sup>nd</sup> Street, unincorporated LA County
4,500 sf coin laundry and self-serve car wash	10601 S. Vermont Street, unincorporated LA County
3,561 sf laundromat (demo 1,056 sf market)	11034 S. Western Avenue, unincorporated LA County
8 apartment units	9222 S. Budlong Avenue, unincorporated LA County
<b>SOURCE:</b> County of Los Angeles, City of Inglewood and City of Los Angeles, Department of Transportation (LADOT) December 2018	

The project would result in a density and use consistent with zoning for the site and therefore within the planning assumptions for the area. Its relatively small size would not result in a cumulatively considerable contribution to impacts on public services, recreation and utilities. Based on review of cumulative projects, anticipated cumulative development in the area is also generally consistent with existing zoning and therefore within the planning assumptions of the area.

Construction noise impacts are limited by distance; in order for construction noise from two or more projects in an urban environment to be audible at a given receptor, these projects must be within 800 feet, which means cumulative projects would have to be separated by less than 1,600 feet in order for impacts to combine. Since the nearest cumulative project is approximately 1,800 feet away construction noise impacts would not result in significant cumulative noise impacts.

Operational noise impacts are associated with mobile sources, stationary equipment (e.g. HVAC) and user activity. Noise from stationary equipment is regulated by ordinance (see discussion of noise above) and noise from stationary equipment and on-site activities would be limited by distance similar to construction noise and therefore would not have the potential to result in significant cumulative impacts with cumulative projects.

Mobile source noise is related to vehicle use, it is most concentrated at the site and then disperses to all the different destinations of project users who arrive/depart by vehicle. The project contribution to mobile-source noise levels at the site would be minor given the context for the site adjacent to the 105 Freeway and would be even less with distance from the site and therefore the project's contribution to mobile source noise levels as a result of cumulative projects would not be considerable.

#### ***Unusual Circumstances [Section 21159.25(c)(2)]***

As explained further in more detail above and below for some environmental issue areas, as a result of the project location in an urbanized area, and expected construction and operational characteristics, the project



would not have the potential to result in significant environmental impacts with respect to any environmental issue area. The project is an urban use including residential uses within an urban area that would involve typical construction activity; there is no evidence of any unusual circumstances associated with the project on the project site that could result in a significant impact on the environment.

None of the following issue areas would be significantly impacted by the project: agricultural resources, air quality, biological resources, cultural resources, geology/soils, greenhouse gas emissions, hazards/hazardous materials, hydrology/water quality, land use, mineral resources, noise, population/housing, public services, recreation, transportation/traffic, tribal cultural resources, or public utilities/service systems issues and therefore would not have the potential to result in a considerable contribution to these impacts (see discussion of cumulative impacts above).

***Scenic Highways and Scenic Resources [Section 21159.25(c)(3)]***

The project site is located in an urban area of unincorporated Los Angeles County. It is not visible from any State-designated scenic highway.<sup>8</sup> The closest roadways with any scenic designation from the State (about 11 miles to the northeast), is the Arroyo Seco Historic Parkway (Route 110). The project would result in intensification of use on an existing urban site and would not affect any scenic resources.

***Hazardous Waste Sites [Section 21159.25(c)(4)]***

A review of the Envirostor and Geotracker web sites (see **Figures 4 and 5** below) indicates that the site is not listed on any hazardous materials list identified in California Government Code Section 65962.5.

***Historical Resources [Section 21159.25(c)(5)]***

The site is currently vacant and mostly paved and has been substantially disturbed. Preliminary geologic explorations have found construction debris down to 20 feet below the current ground surface. The project would not result in disturbance below levels previously disturbed by past uses on the site as well as construction of the adjacent 105 freeway. There are no known historical resources on the site or in the immediate vicinity<sup>9</sup> and therefore the project has no potential to result in a substantial change to the significance of an historical resource.

<sup>8</sup> Officially designated highways are identified at: [http://www.dot.ca.gov/hq/LandArch/16\\_livability/scenic\\_highways/](http://www.dot.ca.gov/hq/LandArch/16_livability/scenic_highways/) accessed December 18, 2018

<sup>9</sup> Draft EIR Connect Southwest LA: A TOD Specific Plan for Athens-Westmont, Los Angeles County Department of Regional Planning, May 2018. See Sections 4.3.4 Cultural and Tribal Resources (pages 4-6 and 4-9) and Section 5.3 Cultural Resources (starting at page 5.3-1). This EIR is a programmatic document that includes the project site. It is available at the following locations: [http://planning.lacounty.gov/assets/upl/project/southwest\\_deir.pdf](http://planning.lacounty.gov/assets/upl/project/southwest_deir.pdf)

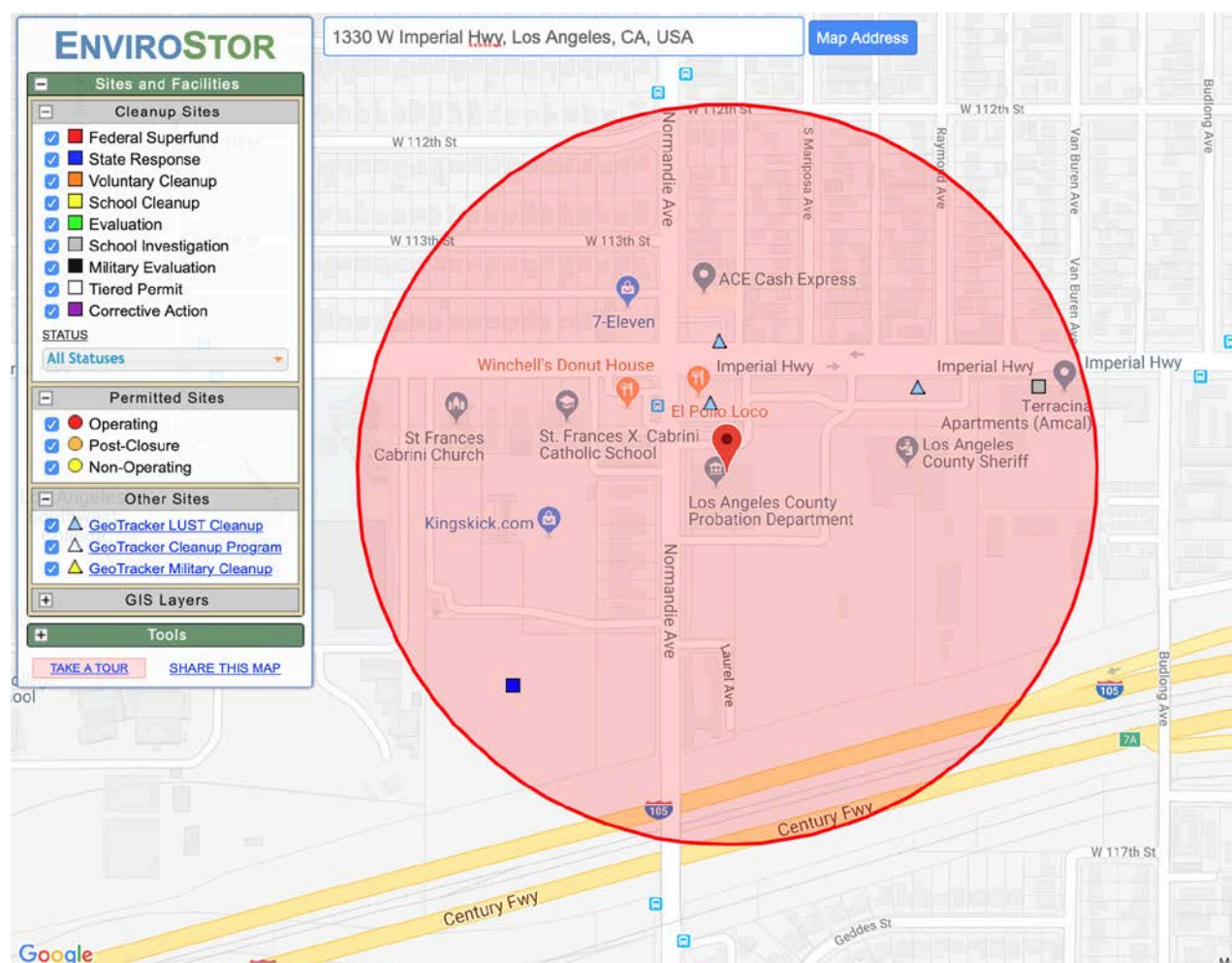


Figure 4 Results of Envirostor Search

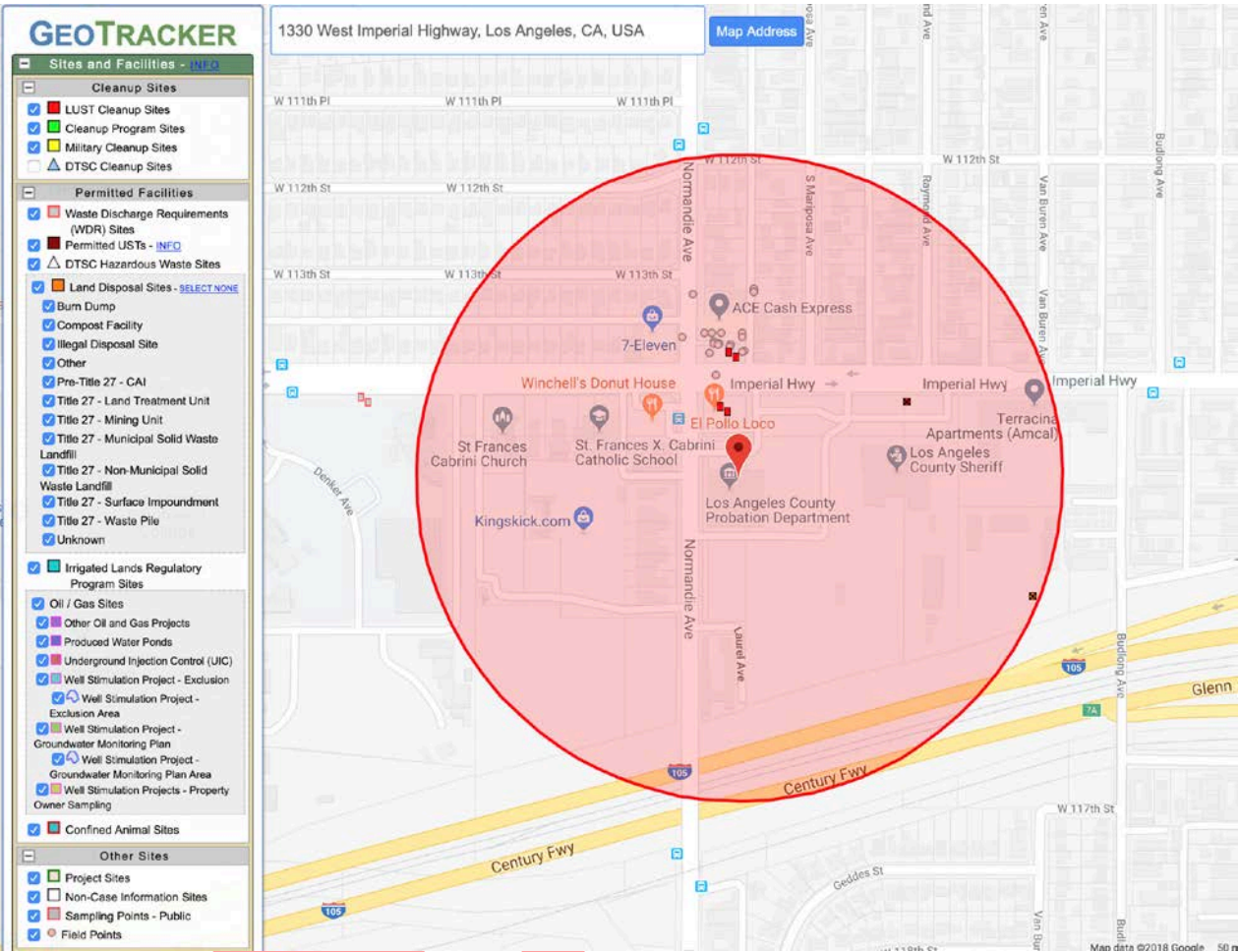


Figure 5 Results of Geotracker Search

**Emergency Exemption (Statutory)**

Public Resources Code Section 21080(b) identifies activities to which CEQA does not apply. Subsection (4) identifies “specific actions necessary to prevent or mitigate an emergency.” CEQA Guidelines Section 15269 provides guidance on emergency projects exempt from CEQA.

Public Resources Code Section 21080(b) indicates:

*(b) This division [CEQA] does not apply to any of the following activities:*

...

*(4) Specific actions necessary to prevent or mitigate an emergency.*

CEQA Guidelines Section 15269 indicates:

*15269. Emergency Projects*

*The following emergency projects are exempt from the requirements of CEQA.*

...

*(c) Specific actions necessary to prevent or mitigate an emergency. This does not include long-term projects undertaken for the purpose of preventing or mitigating a situation that has a low probability of occurrence in the short-term, but this exclusion does not apply (i) if the anticipated period of time to conduct an environmental review of such a long-term project would create a risk to public health, safety or welfare, or (ii) if activities (such as fire or catastrophic risk mitigation or modifications to improve facility integrity) are proposed for existing facilities in response to an emergency at a similar existing facility.*

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...

**Project Analysis**

Homelessness in the City and County of Los Angeles experienced a large increase from 2016 to 2017. Los Angeles County has more unsheltered homeless individuals than any other U.S. county. The County’s total homeless population increased to an estimated 55,048 in 2017 up from 46,874 in 2016 (and about 32,000 in 2010).<sup>10</sup> During the same time period homeless youth (under the age of 24) increased 61% (to about 5,000).<sup>11</sup> In addition:

- LA County has the second-highest number of homeless residents in the United States, second only to New York City.<sup>12</sup>
- Homelessness counts in LA County increased from 38,700 individuals to over 55,000 between 2010 and 2017, an increase of 42%.<sup>13</sup>
- This is tempered only slightly by the 2018 homeless count of 52,765 individuals, the first decrease in four years, of which 39,000 people are living outside.<sup>14</sup>
- Over 700 unsheltered individuals live within a two-mile radius of the proposed Safe Landing site.<sup>14</sup>

<sup>10</sup> Los Angeles Homeless Services Authority, May 2017

<sup>11</sup> Ibid

<sup>12</sup> <https://www.dailynews.com/2018/12/17/hud-report-l-a-county-has-second-highest-homeless-population-of-u-s-regions/>

<sup>13</sup> <https://www.lahsa.org/documents?id=2059-2018-greater-los-angeles-homeless-count-presentation.pdf>



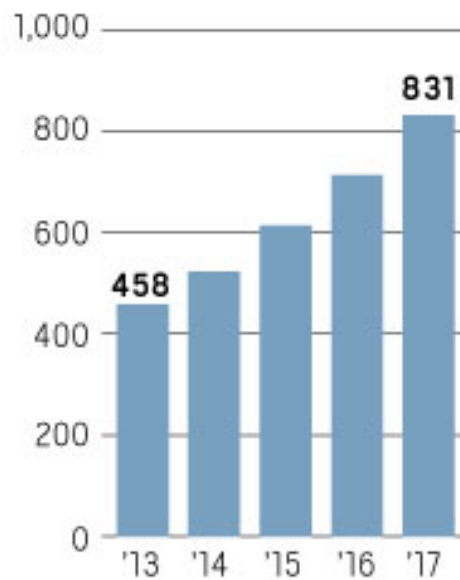
In addition to the alarming increase in homeless youth, the Los Angeles area is experiencing an equally alarming increase in older homeless people (over the age of 62). This population surged by 22% in 2018 to nearly 5,000 people.<sup>15</sup>

While the project site is not within the City of Los Angeles, it is only just outside its borders (2000 feet) and therefore the project is anticipated to serve the homeless population of the City as well as other areas of the County. In the City of Los Angeles, the homeless population increased 23% from 2016 to 2017.<sup>16</sup> On April 17, 2018, Mayor Eric Garcetti declared a shelter crisis to provide emergency housing for some of the estimated 25,237 unsheltered homeless people in the City of Los Angeles.<sup>17</sup> On October 30, 2018, the Los Angeles County Board of Supervisors declared a shelter crisis to address homelessness in unincorporated LA County (estimated to be more than 5,000 people).<sup>18</sup>

The number of homeless deaths has increased dramatically in recent years (from 458 in 2013 to 831 in 2017).

### HOMELESS DEATHS

The number of homeless deaths in Los Angeles County has increased by 81.5 percent in five years.



Sources: Los Angeles County Department of Mental Health and Los Angeles County Office of Medical Examiner

SCNG

<http://file.lacounty.gov/SDSInter/bos/supdocs/120790.pdf?rel=outbound>

<sup>14</sup> Los Angeles County Homeless Emergency and the Safe Landing Project, Mark Ghaly, Director, Center for Health and Social Impact, Los Angeles County Chief Executive Office, January 15, 2019. See Attachment C.

<sup>15</sup> Los Angeles Times, July 19, 2018

<sup>16</sup> Los Angeles Homeless Services Authority, May 2017

<sup>17</sup> <https://www.lamayor.org/mayor-garcetti-la-city-council-declare-shelter-crisis-mayor-signs-package-ordinances-address-la's>

<sup>18</sup> <http://ridley-thomas.lacounty.gov/index.php/board-declares-emergency-and-places-homeless-initiative-on-ballot/>

The homeless population is particularly susceptible to certain diseases that can spread in unhygienic conditions found when people sleep on the street. Los Angeles County experienced a typhus outbreak in the summer of 2018.<sup>19</sup> Typhus is a disease spread by rats that is often associated with cramped unhygienic conditions. In 2017, Los Angeles County experienced an outbreak of hepatitis A virus (HAV) occurring primarily among persons experiencing homelessness or with illicit drug use (IDU).<sup>20</sup> Some diseases that start in homeless populations have the potential to spread to the general population where a disease is particularly contagious.

The emergent morbidity and mortality threat of the opioid epidemic and undertreated complex medical and mental health issues facing the homeless, supported by official declarations of both homelessness and shelter crises in Los Angeles County, are emergencies involving clear and imminent danger, and the proposed Safe Landings project is necessary to prevent and/or mitigate these emergency conditions.<sup>21</sup>

This project would involve construction of facilities (that the County would own) that are necessary to provide service essential to public health, safety and welfare by mitigating the emergency conditions associated with the shelter crisis.

A number of new dedicated funding sources have recently been approved at the state and local levels to address the homeless crisis:

- \$2 billion bond in the California "No Place Like Home" initiative;<sup>22</sup>
- \$1.2 billion local (City of Los Angeles) bond measure (Measure HHH) approved in November 2016, generated over a period of ten years;
- County-wide Measure H, approved in March 2017, provides a 0.25 percent sales tax which could generate \$355 million annually for ten years to fund homeless services and prevention.

These funding sources are available for projects (including the proposed project) and resulted in a small decrease in the homeless population between 2017 and 2018 (about 4% which is within the error margin of the count). However, as noted above, these new funds have yet to make a significant dent in the number of homeless people in Los Angeles County.

The project is necessary to provide shelter to people who are already in extreme conditions that expose them to the elements as well as other safety issues associated with being unsheltered. Immediate action is needed to mitigate these conditions.

<sup>19</sup> <http://publichealth.lacounty.gov/eprp/Health%20Alerts/LAHANTyphusupdate101218.pdf>

<sup>20</sup> <http://publichealth.lacounty.gov/eprp/Health%20Alerts/DPH%20HAN%20Hep%20A%20Outbreak%20091917.pdf>

<sup>21</sup> Los Angeles County Homeless Emergency and the Safe Landing Project, Mark Ghaly, Director, Center for Health and Social Impact, Los Angeles County Chief Executive Office, January 15, 2019. See Attachment C.

<sup>22</sup> On July 1, 2016, Governor Brown signed legislation enacting the No Place Like Home program to dedicate \$2 billion in bond proceeds to invest in the development of permanent supportive housing for persons who are in need of mental health services and are experiencing homelessness, chronic homelessness, or who are at risk of chronic homelessness.

**Education**

Sussex University, England, Chemistry, concentration in Environmental Science  
Master's degree, Candidate, Environmental Management, University of San Francisco

**Professional Affiliations**

Association of Environmental Professionals  
Los Angeles Conservancy  
American Planning Association

Ms. Lockwood is an environmental consultant with over 25 years' experience in the preparation of environmental documents pursuant to the California Environmental Quality Act (CEQA) and the National Environmental Policy Act (NEPA). She has been the Project Manager for major projects and technical task leader on complex projects involving noise, air quality, energy, and hazardous wastes/materials issues. Ms. Lockwood has broad knowledge and understanding of State and local planning regulations and regional planning documents in Southern California. She has participated in the preparation of environmental documentation for over 500 projects.

Ms. Lockwood has experience with a wide variety of projects, issues and communities and using this experience is able to quickly identify and address issues of potential concern before they become major problems. Her technical background allows her to review complex documentation and identify potential analytic flaws. For these reasons, Ms. Lockwood is frequently asked by lead agencies, larger consulting firms, and lawyers to provide detailed review and recommendations concerning CEQA and NEPA documents, including providing overall advice concerning approach and content of environmental documents, critical review of completed documents/analyses as well as providing specific review of more complex projects and/or issues.

In January 2006, Ms. Lockwood started the small environmental consulting firm of Sirius Environmental (Sirius). Sirius (WBE/SBE/VSBE) is an environmental consulting firm that provides CEQA and NEPA related services. Sirius Environmental was formed to focus on project and program management of projects and programs requiring a detailed understanding of CEQA and NEPA and requiring responsive, individualized management. Sirius Environmental provides support to developers, engineers, consulting firms and public agencies in the preparation of clear, accurate technical reports and documents that meet the increasingly demanding needs of communities and their decision makers.

Ms. Lockwood's areas of technical specialty are land use, energy conservation, noise, air quality, greenhouse gas emissions and hazardous materials. She has overseen the preparation of numerous technical analyses for a variety of projects – small and large. She is familiar with land use regulation and prepares policy consistency analyses for projects in complex regulatory environments as well as aesthetic analyses for projects in urban and rural environments.

Ms. Lockwood is an experienced CEQA and NEPA project manager. She has overseen the preparation of comprehensive environmental documents for a variety of different projects, managing complex technical analyses and providing advice to clients regarding effective mitigation strategies. She is familiar with recent case law with respect to environmental documentation. She undertakes public outreach for controversial projects in a number of sensitive communities.

Ms. Lockwood provides QA/QC for a variety of projects including transportation projects (Regional Transportation Plans, Mid-Coast Corridor Transit Project, Orange Line Extension), policy documents (City of Los Angeles CEQA staff training, Updated Thresholds Guide) and plans (Mobility Element, Hollywood Community Plan, Boyle Heights Community Plan).

Ms. Lockwood emphasizes quality. She ensures that information is complete, accurate, concise, and understandable to the reader.

## **Attachments**

- A. Traffic Review –1328 West Imperial Highway**
- B. Biological Resources Review**
- C. Los Angeles County Homeless Emergency and  
the Safe Landing Project**





## TECHNICAL MEMORANDUM

Date: November 2, 2018  
To: Wendy Lockwood, Sirius Environmental  
From: Brian Marchetti, AICP  
Subject: Traffic Review – 1328 West Imperial Highway, South Los Angeles  
KOA Project JB81225

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KOA prepared this traffic review, per the County of Los Angeles Department of Public Works (LACDPW) traffic study guidelines and policies, for the 350-bed transitional housing facility proposed by LA Family Housing. The proposed project would be located at 1328 West Imperial Highway, within the unincorporated County of Los Angeles neighborhood of West Athens.

### Conclusions

The proposed project would generate a total of 406 daily weekday vehicle trips, including 38 a.m. peak hour trips and 38 p.m. peak hour trips.

Per the *Traffic Impact Analysis Report Guidelines* document, published by LACDPW in December 2013, "A traffic report is generally needed if a project generates over 500 trips per day...." A traffic impact study would not be required by LACDPW for this project, based on the trip generation estimates provided in this document.

Given the relatively low trip generation for the project, it is not anticipated that the project would contribute a considerable amount of traffic to cumulative impacts.

### Project Description

The proposed project would provide temporary (up to six months) housing for up to 320 men and women. There would be approximately 25 staff present on a 24-hour basis. The dormitory facility would house individuals indoors and potentially outside in tents. Psychological and other medical services would be available to residents. Parking on site would be available along with storage and housing for pets.

## Analysis Methodology

For this traffic review of the proposed project, rates defined by the City of Los Angeles (as a local source of surveyed data for the specific project use) were applied. The rates are defined by the City *Transportation Impact Study Guidelines*, published in December 2016 and based on vehicle trip surveys collected at affordable housing sites located within in the City. LACDPW has accepted the use of these rates for PSH projects within the County, and for similar projects such as the proposed use.

It is anticipated that auto-ownership rates for shelter populations are much lower than PSH populations, but on-site supportive staffing is generally higher for shelters than PSH, although on-site staffing varies substantially for each (PSH and shelters). The related PSH rates were applied to the proposed project, as this type of use was considered to be similar in trip generation activity to the proposed transitional housing facility use.

The affordable housing rates of the City guidelines are provided in Table 1 below, excerpted directly. The PSH rates at the bottom of the table were applied to the proposed project.

**Table 1 – Affordable and PSH Rates from the City of Los Angeles**

<i>Affordable Housing Type</i>	<i>Daily Rate (Trips per DU)</i>	<i>Average AM Peak Hr Rate (Trips per DU)</i>	<i>% AM Trips In</i>	<i>% AM Trips Out</i>	<i>Average PM Peak Hr Rate (Trips per DU)</i>	<i>% PM Trips In</i>	<i>% PM Trips Out</i>
Family	4.08	0.50	40%	60%	0.34	55%	45%
Seniors	1.72	0.12	38%	62%	0.15	52%	48%
Permanent Supportive Housing	1.27	0.12	44%	56%	0.12	59%	41%

Source: City of Los Angeles, *Transportation Impact Study Guidelines*, December 2016.

## Trip Generation Estimate

The identified City of Los Angeles trip generation rates for Permanent Supportive Housing were applied to calculate the trip generation for the proposed project use, based on the proposed number of residents/beds.

Table 2 provides the project trip generation calculations. It is estimated that the proposed project would generate a total of 406 daily weekday vehicle trips, including 38 a.m. peak hour trips and 38 p.m. peak hour trips.

**Table 2 – Project Trip Generation**

ITE Code	Average Vehicle Trip Ends Basis	Intensity	Weekday						
			Daily	AM Peak Hour			PM Peak Hour		
			Total	Total	% In	% Out	Total	% In	% Out
RATES									
520	Units in TPA *	per resident/ unit	1.27	0.12	44%	56%	0.12	59%	41%
TRIPS									
520	Units/ Residents	320	406	38	17	22	38	23	16

The proposed project would not require a traffic impact study, as the estimated trip generation falls under the 500-trip daily minimum threshold defined by the County.

### Area Transit Service and TPA Definition

The project vehicle trip generation could be diminished by the available transit trip opportunities of the local area transit network. The general definition of a High Quality Transit Area (HQTa) according to the Southern California Association of Governments (SCAG) document *Sustainable Communities Strategy (SCS) Background Documentation* is "...a walkable transit village or corridor, consistent with the adopted Regional Transportation Plan/Sustainable Communities Strategy (SCS) and is within one half-mile of a well-served transit stop [or 'Major Transit Stop'] or a transit corridor with 15-minute or less service frequency during peak commute hours".

The specific definitions for HQTAs within that document are as follows:

- Major Transit Stop A site containing an existing rail transit station, a ferry terminal served by either a bus or rail transit service, or the intersection of two or more major bus routes with a frequency of service interval of 15 minutes or less during the morning and afternoon peak commute periods.
- Transit Priority Area (TPA): An area within a ½-mile of high quality transit; a rail stop or a bus corridor that provides or will provide at least 15-minute frequency service during peak hours.

The project area has multiple lines that meet the HQTa definition. The presence of Metro Rail within the area and two high-frequency bus lines that share stops adjacent to the project site, satisfy this definition.



The following five transit lines serve the local area, and one is a rail line and two are high-frequency bus lines.

- Metro Green Line Light Rail (via Vermont / Athens station) – Less than one-half mile, high frequency
- Metro Bus Line 120 – Peak frequency of 45 minutes
- Metro Bus Line 206 – Peak frequency of 9 to 13 minutes
- Metro Bus Line 209 – Peak frequency of 45 to 60 minutes
- Gardena Bus Line 2 - Peak frequency of 15 minutes

The analysis of trip generation in this document is conservative, because it does not include credits for transit use. The propensity for transit use, however, is high and the calculated trip generation would likely be lowered by this level of transit availability.

### **Definition of Future Baseline/Pre-Project Conditions**

Planned projects were defined by development information held by the City of Los Angeles DOT Development Review staff, County of Los Angeles Regional Planning staff, and the City of Inglewood. Planned/pending projects generally within 1.5-miles of the Project site were mapped and the trip generation of each was compiled/computed. This information was compiled to provide general information on area project cumulative traffic impacts.

Table 3 provides the trip generation summary of the cumulative projects compiled for this study. The projects as a whole would generate a total of 7,863 daily vehicle trips, including 633 trips in the a.m. peak hour and 619 trips in the p.m. peak hour. Many of the individual project trip totals in this table do not include pass-by trips, internal trips, high-frequency transit areas, and other credits that apply to these characteristics that would likely reduce these numbers.

Given the relatively low trip generation for the project, it is not anticipated that the project would contribute a considerable amount of traffic to cumulative impacts.

A map of these project locations is provided in Attachment A.



**Table 3 – Cumulative Projects Trip Generation**

FORECAST TRIP GENERATION												
Land Use	Jurisdiction	Address	Intensity	Units	Daily	Weekday AM Total	Weekday AM IN	Weekday AM OUT	Weekday PM Total	Weekday PM IN	Weekday PM OUT	
Shopping mall expansion	City of Inglewood	2616 W Imperial Highway	13.000	ksf	491	39	21	18	55	27	27	
Charter Middle School	City of Los Angeles	10045 S Western Ave	275	enrollment	446	149	82	67	44	22	22	
Gas Station	City of Los Angeles	10000 S Vermont Ave	8	fueling positions	631	39	19	20	52	26	26	
Gas Station	City of Los Angeles	505 W Century Blvd	6	fueling positions	489	30	15	15	40	20	20	
Gas Station w/. Convenience store	County of Los Angeles	11408 S NEW HAMPSHIRE Avenue LOS ANGELES CA 90044	2.900	ksf	4,176	220	112	108	256	131	126	
addition to commercial building (med clinic)	County of Los Angeles	9621 S VERMONT Avenue, LOS ANGELES CA 90044	2.182	ksf	83	11	7	5	10	5	5	
Commercial	County of Los Angeles	10401 S VERMONT Avenue, LOS ANGELES CA 90044	0.250	ksf	2	0.4	0.3	0.0	0.4	0.1	0.3	
Residential	County of Los Angeles	1252 W 105TH Street LOS ANGELES CA 90044	1	d.u.	7	1	0.2	0.4	1	0.4	0.3	
Affordable Senior Housing	County of Los Angeles	11130 S Western Avenue, Los Angeles CA 90047	74	d.u.	274	24	11	13	23	12	11	
school	County of Los Angeles	1743 Imperial Highway, Los Angeles CA 90047	11.662	ksf	228	79	44	36	37	16	21	
Affordable housing for families/at-risk youth	County of Los Angeles	1539 102nd Street, Los Angeles CA 90047	39	d.u.	285	22	6	16	26	15	11	
Apartments	County of Los Angeles	10601 S VERMONT Street, Los Angeles CA 90044	10	d.u.	73	6	2	4	7	4	3	
Coin laundry and self-serve car wash	County of Los Angeles	11034 S Western Avenue, Los Angeles CA 90047	4.500	ksf	525	0	0	0	52	26	26	
Demo 1056 sf of 2500 sf market and add 3561 sf to create laundromat	County of Los Angeles	9222 S Budlong Avenue, Los Angeles CA 90044	2.483	ksf	94	7	4	3	10	5	5	
Apartments	County of Los Angeles		8	d.u.	59	4	1	3	5	3	2	
<b>TOTAL RELATED PROJECT TRIPS</b>					<b>7,863</b>	<b>633</b>	<b>325</b>	<b>308</b>	<b>619</b>	<b>314</b>	<b>305</b>	

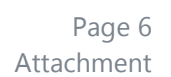
\* Used ITE Land Use 220 Rates for Peak Periods

\*\* Used ITE Land Uses 522 and 530 for Daily Trips

\*\*\* Used ITE Land Uses 220 and 820 for Daily Trips

Note: All trips for City of Los Angeles from study summaries provided by LADOT, or by use of ITE rates from ITE Trip Generation (10th ed).

KSF = 1,000 sq.ft., DU = dwelling units.



## RESUMES

### BRIAN MARCHETTI, AICP PROJECT MANAGER

#### SENIOR TRANSPORTATION PLANNER

Mr. Marchetti is a Senior Transportation Planner at KOA, managing traffic impact, access and pedestrian circulation, parking, and transit planning studies. He has 23 years of experience in the industry. He has extensive experience with traffic impact analysis and active transportation studies, with coordination on project CEQA documents, and with on-call planning services for local cities. Mr. Marchetti has produced studies for environmental documentation on multiple projects, ranging from large commercial centers, mixed-use development projects, residential tract developments, public utilities projects, public facility and park projects, institutional and school facility traffic impact and pedestrian access projects, to transit and station interface projects. He is a Member of the American Institute of Certified Planners (AICP), #016504.

#### RELEVANT EXPERIENCE

##### **On-Call Engineering & Planning Services, Glendale, CA**

KOA is providing traffic engineering and transportation planning services to the City of Glendale that include review of traffic impact studies, site access and circulation design reviews, pedestrian circulation studies, parking studies, and transportation modeling analyses. Design efforts include review of site access, off-site traffic improvements, on-site parking layouts, on-site delivery truck loading zones, on-site vehicle, delivery truck and pedestrian circulation. Peer reviews of traffic studies are a particular focus of KOA's efforts on this project, and those reviews include reviews of and comparisons to city-wide and other nearby traffic studies, reviews of study scoping documents, review of applied growth, project trip generation, cumulative projects inclusion, level of service calculations accuracy, and site vehicle and pedestrian access issues. KOA provided these services through task orders issued by the City, and worked directly with City engineering staff to supplement their daily efforts.

##### **West Covina On-Call Engineering Services, West Covina, CA**

KOA is a part of the City of West Covina's engineering department preferred traffic engineering consultant list for traffic impact and parking studies. KOA coordinates directly with the City on the project scoping process during the proposal effort and submits the draft product to the City for review and comment prior to the completion of the study. Current and/or recent project include:

- West Covina Self Storage traffic impact study (424 South Lark Ellen Avenue)
- Toyota of West Covina traffic impact study
- 520 South Lark Avenue traffic impact study
- LA Fitness traffic and parking study
- West Covina Lakes Office Complex Parking Study and Design Study
- West Covina Orange Medical Plaza traffic study
- 1700 West, West Covina Parkway traffic study



#### EDUCATION

Bachelor of Science, Urban & Regional Planning, California State Polytechnic University, Pomona

#### REGISTRATIONS

American Institute of Certified Planners, #016504

#### PROFESSIONAL AFFILIATIONS

American Planning Association, Member

Southern California Planning Congress, Vice President of Communications

Los Angeles County Regional Planning History Association

### **West Hollywood Avenues Streetscape TIS, West Hollywood, CA**

Project Manager. KOA assisted the design process for this project by providing input on the probable effects of proposed streetscape elements on traffic flow, parking availability, and area valet operations. KOA used traffic volumes from recent traffic studies, the General Plan, and focused collection of new data, to analyze traffic conditions without and with potential project-related changes at major intersection approaches. KOA provided recommendations on general design issues that could negatively affect traffic without commensurate benefits to bicyclists or pedestrians. KOA was present at design charrettes and meetings with the project advisory group. KOA reviewed proposed sidewalk extension and raised median locations related to the project, to determine potential impacts to major driveway access, pedestrian crossing patterns, and turning movement patterns. A thorough traffic engineering assessment was conducted by KOA to illustrate the trade-offs associated with different alternatives on city streets in terms of traffic delay, alternate mode accommodation and safety. The final report included discussion on project options and differences in roadway operations with related roadway reconfigurations.

### **San Gabriel 400-420 West Valley Boulevard TIS, San Gabriel, CA**

Principal-In-Charge. KOA prepared of a traffic impact study for the proposed mixed-use project at 400-420 West Valley Boulevard, in the City of San Gabriel. KOA produced previous traffic impact study reports for various land use proposals for the same property. The new proposed project was to be larger, with approximately 20,000 more square feet of commercial area, and approximately 70 more residential units. The project site would include north and south access points, with one of those locations providing direct access into a residential neighborhood. A neighborhood impact analysis of three roadway segment locations was included in the analysis.

### **El Segundo Smoky Hollow Specific Plan Traffic/Parking Study**

Principal-In-Charge. KOA provided a traffic/circulation and parking analysis for this Specific Plan Update. The goal was to assist in promoting a new development within the plan area, focusing on high-tech, entertainment and business incubator industries and related support services. This area is transitioning away from the traditional light industrial uses that historically served the local aerospace and oil refinery industries. The City's overall goal for the area, however, is to create a unique mixed-use office/industrial district. KOA conducted a traffic analysis of constraints and subsequent impacts of opportunity sites and/or land use changes, and conducted a parking study to identify the general availability on-street parking and its configurations and regulations. The study examined pedestrian walking routes, transit access via an existing City shuttle service that links corporate areas to the downtown area, and linkages to the existing and future bicycle facility network. KOA made recommendations for improvements to these routes and linkages. An analysis of the downgrading of a Secondary Arterial classification to a commercial collector classification was included in the effort.

### **LA Street Civic Building EIR / Parker Center Site**

Project Manager. The City of Los Angeles proposed to redevelop the Parker Center site, which was the former location of the Los Angeles Police Department Headquarters Building. The City needed architectural conceptual designs and an environmental impact report prepared for three potential project alternatives, which included adaptive re-use of the existing building, partial demolition and renovation of the existing building, and demolition of the existing building then replacement with a new one-million square-foot building. KOA's scope of work for this project included preparation of the needed traffic study for incorporation into the EIR document. KOA's traffic impact analysis covered an expansive area of downtown Los Angeles for each of the proposed project alternatives.

### **East Los Angeles Specific Plan, Los Angeles, CA**

Project Manager. KOA conducted the traffic and parking analysis for the proposed East Los Angeles Specific Plan, encompassing all properties located within one-half mile radii of the four Metro Gold Line stations, and other targeted parcels between the boundaries of Cesar Chavez Avenue, Indiana Avenue, Whittier Boulevard, and Margaret Avenue. The environmental documentation was to be a program document, identifying potential impacts for buildout of the specific plan area, and the overall cumulative impacts of Specific Plan and area development. The traffic study focus on potential impacts within and adjacent to the proposed mixed-use corridors and related land use intensification, calculation of increased trip generation and related reductions for shared uses, pass-by trips, and transit use, and examination of potential parking demand and recommended parking requirements.



January 15, 2019

**Ms. Wendy Lockwood**  
Sirius Environmental  
1478 N Altadena Dr.  
Pasadena, CA 91107



**Subject: Biological Resources Review, 1328 W. Imperial Highway, Los Angeles CA 90044**

Dear Ms. Lockwood:

**Purpose of the Letter** - This letter provides the results of a brief biological survey of the project site at the above address. This survey and report is not intended to identify and catalogue every species on the site, but rather to characterize the potential for the site to support habitat for listed species. The entire site was surveyed on foot on January 13, 2019. The weather was chilly, with overcast skies, a slight breeze and threatening rain. The roughly "T" shaped site's primary characteristic is that of an old parking lot that is beginning to degrade, with the southern and western arms of the "T" mostly paved but highly degraded and the eastern arm's substrate consisting of what appears to be ground asphalt and concrete.

**Habitat Present** - Biologically the site is dominated by weedy vegetation in the unpaved areas and emerging from cracks in the paved areas. The remainder of the vegetation is remnant landscaping in parking lot cutouts and planters. This is a typical urban ruderal (weedy) habitat. Nonnative weedy herbaceous species present include tumbleweed (*Salsola tragus*), yellow sweet clover (*Melilotus indicus*), red-stemmed filaree (*Erodium cicutarium*), white-stemmed filaree (*E. moschatum*), cheeseweed (*Malva parvaflora*), garden geranium (*Pelargonium* var.), and flax-leaved fleabane (*Erigeron bonariensis*). Nonnative shrubs and trees on the site include Chinese elm (*Ulmus parviflora*), castor bean (*Ricinus communis*), and fan palm (*Washingtonia* sp.). Numerous nonnative grasses also occupy the property. These grasses include newly emergent annuals that were not identified but likely include many common lawn grasses like rye (*Lolium*) and *Poa*, as well as common naturalized genera such as *Bromus*, wild oat (*Avena*) and smilo grass (*Stipa miliacea*). Perennial grasses include both bunch grasses such as fountaingrass (*Pennisetum setaceum*), and Pampas grass (*Cortaderia jubta*); and rhizomatus grasses Bermuda grass (*Cynodon dactylon*) and kikuyu grass (*Pennisetum clandestinum*).

Dominant among the landscaping present is the ornamental pear (*Pyrus kawakamii*), and Indian Hawthorne (*Raphiolepis indica*), both located in cutouts or planters. English ivy (*Hedra helix*) is climbing each of these species in some of the planters.

Three native species of plants were noted on the property, two are weedy species often found in disturbed areas; telegraph weed (*Heterotheca grandiflora*), lupine (*Lupinus* sp.) and the other is mulefat (*Baccharis salicifolia*) a facultative wetland species. Facultative wetland species are defined as occurring in wetlands about 50% percent of the time and in uplands about 50% of the

time. In this case the mulefat are located at the eastern property boundary in areas where there is likely a slight increase in moisture availability due to runoff from the paved surfaces.

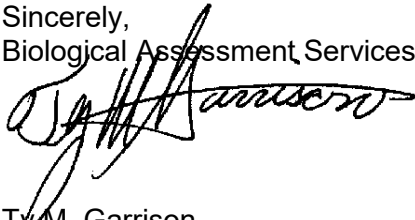
The only wildlife observed at the time of the survey was avian, though some reptiles may occupy the site but would have been inactive due to the cold weather. Coyote is also known to occur there based on the presence of scat. The birds present were all common to the urban suburban environment and include migratory species like the Audubon's (yellow-rumped) warbler, white-crowned sparrow, and meadowlark. Native birds that are resident in the area and were also noted on the site include Allen's hummingbird, American crow, and unidentified gulls. Nonnative birds noted include rock dove (pigeon), house sparrow, and European starling.

Native bird species present are protected under the Federal Migratory Bird Treaty Act (MBTA) and the State California Fish and Game Code (CFGF). These regulations prohibit the take of these native species, including the disturbance of nests that would result in unsuccessful nesting attempts.

**Conclusion** – There is no habitat on the site that would support any listed Rare, Threatened, or Endangered species. The habitat present is typical of an urban vacant lot but even less hospitable because the majority of it is paved. Most of the flora and fauna present are nonnative species that are highly invasive and adapted to disturbance. The few native species noted are all typical, hardy, highly acclimated species that do well in the urban environment.

As always it is a pleasure working with you, and if you have any questions please call.

Sincerely,  
Biological Assessment Services

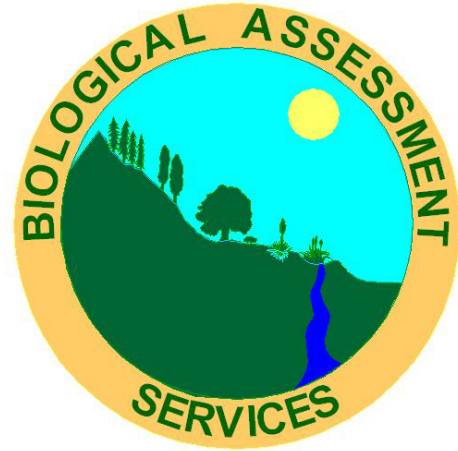
A handwritten signature in black ink, appearing to read 'Ty M. Garrison', written over the printed name below.

Ty M. Garrison  
Principal

## Ty M. Garrison

### Education

M.S., Plant Ecology,  
California State University at Long Beach, 1991  
B.S., Biological Sciences,  
University of Redlands, 1981



### Experience

Mr. Garrison has over 35 years of experience in the application of environmental principles and regulatory requirements to the planning process. He has worked closely with both private planning firms and public planning agencies on projects ranging from simple lot splits to large master-planned developments. His recent experience includes major public projects (railroad and highway improvements) and utilities (various pipelines, cellular communications towers, and fiber optic communications lines).

As an environmental permitting specialist, Mr. Garrison has developed effective working relationships with local, state, and federal agencies throughout southern California. He has also participated in land use planning and development decisions for many communities in southern California, including developing specific plans and general plans, analyzing open space environmental constraints and wildlife corridors, and planning in environmentally sensitive habitats.

Mr. Garrison is a member of the Los Angeles County Significant Environmental Area Technical Advisory Committee (SEATAC). In accordance with LA County General Plan, the SEATAC reviews all proposed development that may affect any of the identified Significant Ecological Areas in the County. The SEATAC holds public meetings to discuss the projects and provides technical guidance to the project applicants, the County Planning Commission, and the County Board of Supervisors.

Mr. Garrison also served as a member of the Oak Woodlands Habitat Conservation Strategic Alliance (Alliance). In accordance with the California Oak Woodlands Conservation Act (AB 242), Los Angeles County (County) was required to develop an Oak Woodlands Conservation Management Plan (Plan) in order to qualify for funding to preserve oak woodlands through the Oak Woodlands Conservation Fund. The Alliance, which consisted of a respected group of biologists, arborists, environmentalists, foresters, planners, Building Industry Association (BIA) representatives, and academics that were chosen to develop the plan for the County. The Alliance, which represents a significant and unprecedented collaborative effort, donated over 5,000 volunteer hours and completed the Plan in May 2011.

Educating and mentoring young biologist and environmentalists, as well as the general public, has always been a gratifying component of Mr. Garrison's career. Having the opportunity to teach Environmental Law, Policy, and Regulation at Whittier College as an adjunct professor was a fulfilling expansion of Mr. Garrison's desire to share his knowledge and experience regarding the environment and our place within it.

In addition to the pre-project surveys, documentation and permitting expertise, Mr. Garrison has extensive experience implementing the plans, measures, and conditions placed upon a project. Mr. Garrison has monitored many construction projects for all aspects of environmental compliance including adherence to SWPPP measures, biological resource monitoring and reporting, wildlife relocation, site restoration, and agency reporting.

The following pages provide more detailed descriptions of some of the larger and more diverse projects in Mr. Garrison's career.

**Biology Subject Matter Expert (SME), Southern California Edison, Devers to Colorado River Transmission Line Project.**

The Devers to Colorado River transmission line project consisted of the construction of 154 miles of 500kv transmission line that, despite the title, spanned the distance from the Colorado River to the Valley Substation near Hemit CA. The project is designed to conduct power from the burgeoning renewable energy projects in the desert to SCEs local distribution system. The project included the development of two new substations and nearly 1000 towers. Mr. Garrison provided review and revision of various previously prepared resource management plans, liaison with resource management agencies (BLM, FWS, CAFWS, CPUC, etc.), and management of the biological consultant's team of field biologists. As part of the natural resources management team for the project Mr. Garrison was specifically charged with managing the biological monitors for the 111-mile segment from the Colorado River to the Devers Substation in Desert Hot Springs CA. This duty included but was not limited to insuring compliance with all permit conditions, reviewing daily monitoring reports, communicating with resource agencies when protected species were encountered, and investigating impacts to sensitive resources.

**Permitting and Environmental Documentation for Fiber Optic Network, Level 3 Communications, (CA and NV)–Permitting and CEQA Documentation Manager**

The Level 3 Communications project consists of environmental and right-of-way permitting for the construction, operation, and maintenance of a buried fiber optic cable that is part of a nationwide long-haul communications network. Duties included biological resource surveys, Biological Assessment preparations, biological permitting, and construction monitoring. The project traversed seven counties and three states. Biological permits and agreements required included Federal Endangered Species Act Section 7 Consultations, State Endangered Species Act 2081 Take Permits, Clean Water Act Section 404, 401, 202(p) Permits, California Fish and Game Code Section 1603 Agreements and many local and regional compliance issues Mr. Garrison also oversaw preparation of CEQA documentation for in-line amplification sites along those routes. The California portions of these routes include many sensitive biological and cultural/historical resources, and require approval of the California Public Utilities Commission. The permitting process and environmental documentation have involved Mr. Garrison's extensive and intensive coordination, consultation, and negotiation with the U.S. Fish and Wildlife Service (USFWS), the California Department of Fish and Game (CDFG), the U.S. Bureau of Land Management (BLM), the U.S. Forest Service (USFS), and the U.S. Army Corps of Engineers (USACE).

Mr. Garrison's involvement in the southern California portion of the project began at the design stage and continued through construction completion. The first assignment was to select several potential routes and evaluate their levels of environmental sensitivity. In many areas this required conducting directed surveys for rare, threatened or endangered species. Mr. Garrison then directed the preparation of the Biological Assessments and the biological portions of the Environmental Assessments for each line. While negotiating the permits described above, Mr. Garrison initiated the development of several environmental training programs for construction workers and biologist that would be working on the project during construction. The project eventually required 128 biological monitors onsite during construction and all construction workers required environmental awareness training. Biologist training educated biologist from outside the region on what sensitive species occur in the area and when and where they were likely to be encountered along the project route. One training program allowed biologist to be authorized by the FWS to handle the Endangered desert tortoise. As FWS, CDFG, and BLM designated project biologist Mr. Garrison was responsible for overseeing biological monitoring and reporting to the permitting agencies through the conclusion of construction.

**Avian Specific Work Experience**

Mr. Garrison has conducted hundreds of biological surveys that included general assessment of avian resources and bird species noted within the project area. He has also conducted nesting bird surveys for dozens of small projects throughout southern California. These surveys were designed to locate and identify existing bird nests prior to the onset of project activities in order to provide protection for the birds and their nests. One of the largest of these projects included 400 acres of high desert land in the Antelope Valley that was slated for construction of a sewage treatment plant. Mr. Garrison and his team located all of the nests within, and adjacent to, the action area and placed construction buffers around the nests as



required by CDFW. On a related project, Mr. Garrison and his team surveyed thousands of acres of high desert land and in the Antelope Valley for bird nests in preparation for agricultural conversion using reclaimed water. The land had been farmed in the 1930s but had been fallow since, allowing some desert flora recruitment and subsequent faunal establishment. One major component of this project was the location of burrowing owl burrows and the construction of artificial burrows so that the owls could relocate to the new burrows when the old, concrete-asbestos, irrigation pipes that the owls had been using were removed.

Additionally, Mr. Garrison has supervised teams of biological and avian monitors on large construction projects such as the SCE transmission line described below. On that project part of Mr. Garrison's duties included interacting with resource management agencies regarding potential impacts to nesting birds as a result of construction activities. One of the primary duties in that regard was to formulate reasonable requests for nest buffer reductions when warranted by the proposed construction activity and the species of bird and nest location, among other factors. Other duties included determining the course of action when required to rescue birds in distress and reporting on avian mortalities. Most of the avian mortalities were a result of collisions with transmission lines but one eagle was killed by a collision with an adjacent wind turbine.

Mr. Garrison has held a California gnatcatcher recovery permit but he has allowed that permit to lapse because he was not actually conducting California gnatcatcher surveys, but was hiring or supervising others to conduct those surveys.

#### **Base Realignment and Closure (BRAC) Studies**

As part of the BRAC process Mr. Garrison conducted several on Camp Pendleton to support the realignment of troops and support from other locations. Included in these studies were a hangar firefighting system cleanup and disposal study that included the design of a several mile-long storage/disposal pipeline between MCAS Camp Pendleton and the nearest treatment plant. Mr. Garrison also conducted numerous feasibility studies involving the demolition or reuse of facilities on the Station. These studies included the evaluation of potential human impacts of hazardous materials and the potential to impact several sensitive wildlife species in residence adjacent to the Station.

#### **Environmental Documentation for Regional Communication System (RCS), San Diego County (CA)**

Prepared environmental documentation for five new telecommunication sites in San Diego County. The project is part of a larger system of improvements to the County's RCS that are needed to eliminate areas in the County from which radio communication is impossible, and to provide a radio system that allows communication between all of the emergency service providers in the area. Prepared agency notifications, public notification, Application for Environmental Initial Study, Environmental Initial Study/Negative Declaration, CDFG De Minimus form (Certificate of Fee Exemption), Notice of Completion, Notice of Determination, and Public Review Release Form. Several of the sites also required the preparation of a visual and aesthetic analysis in accordance with guidelines of the Federal Highway Administration (FHWA) and the California Department of Transportation (Caltrans).

#### **As-Needed Environmental Services, City of San Diego (CA)–Senior Biologist**

As senior biologist and environmental scientist, directed staff and directly assisted City engineers on 19 projects. Conducted general biological resource assessments and sensitive species surveys and obtained environmental permits. In Penasquitos Lagoon, monitored the emergency repair of a broken sewer main and negotiated the following resource permits for the project: 404 Permit (USACE); 1601 Agreement (CDFG); Temporary Use Permit (California Department of Parks and Recreation); and a Coastal Permit (California Coastal Commission). A large fine threatened by the EPA was avoided due to Mr. Garrison's efforts. He also prepared the mitigation and revegetation plan and mitigation monitoring plan for the project. At Adobe Falls, he conducted an impact analysis for sewer line access road construction, which required general biological surveys and focused California gnatcatcher surveys and sensitive plant inventories. Mr. Garrison had similar duties on the remainder of the projects completed as part of this contract.

**As-Needed Biological Services for San Diego County Department of Public Works (CA)– Senior Biologist**

As senior biologist and environmental scientist, conducted biological survey and monitoring for five County projects. For the Dehesa Road culvert replacement, directed California gnatcatcher surveys and wetland delineations. For the Central Avenue Bridge replacement, supervised the relocation of mature trees, construction monitoring (environmental), and revegetation monitoring. For the Bonita Bridge replacement, monitored construction and revegetation. For the Kitchen Creek Bridge replacement, prepared a revegetation plan and monitored Revegetation. For the Spring Valley Sewer Outfall mitigation monitoring project, significantly modified an existing revegetation plan and monitored revegetation.

**Resource Management Plan (RMP) for Montgomery Field, San Diego (CA)**

Prepared the RMP for Montgomery Field (a general aviation airport) in the manner approved by the USFWS and agreed to by the USACE, the CDFG, and the City of San Diego. The purpose of the RMP was to inventory the biological and cultural resources existing within the airport boundaries and to immediately protect potentially significant areas from accidental disturbance. The RMP was crafted to protect and enhance (where possible) substantial resources while meeting safety criteria of the Federal Aviation Agency (FAA) and maintaining airport operations. The RMP was written as a “living document” that will allow airport operations, construction activities, and natural resources to evolve together over the years to come. As negotiated with the USFWS, the precise contents of the RMP were not finalized until there was a clear understanding of the existing biological resources at the Airport. Once the report elements were finalized, a preliminary draft RMP was prepared that includes a discussion of biological and cultural resources issues and detailed specific construction monitoring actions for the first five years of the program.

**China Lake Naval Weapons Station Revegetation Test Program, CA**

China Lake encompasses many different habitat types that are subjected to a wide range of disturbances including explosive detonations, vehicle maneuvers, and fire, among others. The program was designed to develop revegetation strategies for the range of habitats and disturbances encountered.

**City of Carlsbad Habitat Conservation Plan, CA**

Prepared habitat conservation plan to compensate for projected impacts of the City of Carlsbad’s proposed public golf course. Golf course development would impact wetland and riparian, native grassland, and coastal sage scrub habitat. These habitats are occupied by numerous sensitive species including the Threatened California gnatcatcher. The habitat conservation plan proposed preservation and restoration of the full complement of locally native habitats located around city-owned Calavera Lake. Much of the native habitat around Calavera Lake had been disturbed by agriculture, non-native species invasion, off-road vehicle activity, and illegal dumping. Methods proposed to restore the site included topsoil salvage and relocation from the impact site, non-native species removal, and native species reintroduction. A long-term management plan that included vehicle exclusion, maintenance, and monitoring was also developed.

**City of Glendora Forensic Environmental Documentation**

While conducting biological surveys on the Hughes property at the northern terminus of Loraine Ave. in 1989, Mr. Garrison discovered a population of the Endangered thread-leaved brodiaea (*Brodiaea filifolia*). The species had not been previously documented in the area except by one cryptic reference to a location in the “foothills above Glendora” from 1926. The new discovery eventually led to the establishment of a park and preserve on the site. Subsequently Mr. Garrison conducted surveys on other properties in the Glendora foothills and discovered other populations of the species. The most notable population was located on and adjacent to Guard Ranch, in the vicinity of what is now known as Gordon Highlands Road, Ferguson Motorway, and Wildwood Motorway. This discovery and subsequent negotiations led to the permitted development of “Guard Ranch” now called Gordon Highlands, with conservation easements for the Brodiaea.

Many years later, Mr. Garrison was asked by the City to prepare a detailed account of the permitting history and subsequent permit condition violations on the Guard Ranch property. After detailed and exhaustive research, the resulting tome was submitted to the City for their use.

### **Section 1600 and/or Section 404, CA**

Delineated areas sensitive due to Section 1603 (California Fish and Game Code) and/or Section 404 constraints on numerous projects in Southern California. Assessments involve a practical knowledge of EPA/ACOE wetland determination criteria, including soil sampling, vegetation analysis, and hydrological data interpretation.

### **General Biological Resource Assessments**

Conducted more than 100 general biological resource assessments of parcels in size from less than one acre to more than 10,000 acres. Assessments involve identification of any sensitive species or resources potentially occurring on the project site, field investigations, assessments of project impacts to natural resources, and proposal of measures to mitigate project impacts.

### **Oak Tree Surveys, CA**

Conducted oak tree surveys in accordance with the standards of many Southern California municipalities. Studies have ranged in size from four to over 6,000 trees.

### **Transplant Programs, CA**

Performed two transplant programs involving the relocation of rare plants (*Dudleya multicaulis*, *Brodiaea filifolia*) from development sites to designated open space locations.

### **Endangered Species Assessments, CA**

Conducted many assessments involving rare, threatened, and/or endangered species. Studies involved habitat assessments, field identification of species, impact determinations, mitigation development, and agency coordination.

Discovered previously unrecorded populations of the State Endangered thread-leaved Brodiaea (*Brodiaea filifolia*) in the foothills of Glendora.

### **City of Adelanto General Plan, CA**

Developed general plan guidelines for the newly incorporated City of Adelanto. Guidelines included the preservation of major natural drainage courses, wildlife movement corridor/habitat linkage protection, and Endangered and sensitive species habitat preservation.

### **City of Mission Viejo, CA**

Developed guidelines for the use of undeveloped open-space areas in the City of Mission Viejo.

### **Microecological Investigations, CA**

Conducted several investigations on the effect of minor microecological variations on both floral and faunal community structure.

### **Thousand Pines American Baptist Outdoor Center, CA**

Designed, supervised, and constructed three miles of hiking trails at Thousand Pines American Baptist Outdoor Center in the San Bernardino Mountains. Authored and illustrated trail guidebook emphasizing ecological awareness.

## Professional Endeavors

Biological Assessment Services – Full time 2010 – Present.

SEATAC

Los Angeles County Significant Ecological Area Technical Advisory Committee – 2003 - Present

SWCA Inc. - 2009-2010

Land Design Consultants – 2001-2009

HDR Engineering, Inc. – 1998-2001

P&D Consultants – 1994-1998

Biological Assessment Services, Owned and Operated – 1990—1994 Present; Part Time 1994 - 2010

The Planning Center – 1988-1990

Michael Brandman Associates – 1986-1988

LSA Associates – 1985

Independent Consultant – 1982 - 1985

## Professional Affiliations

California Native Plant Society

California Oak Foundation

## Publications

**Seasonal Dormancy in *Dudleya parva*** (Master's thesis)

Hundreds of Biological Reports entered into the public record as part of the environmental review, entitlement, permitting, and reporting process.

# **Los Angeles Homeless Emergency and the Safe Landing Project**

Mark Ghaly, MD MPH ([mghaly@ceo.lacounty.gov](mailto:mghaly@ceo.lacounty.gov))

## **The Homelessness Emergency in Los Angeles County**

Street-based homelessness is not new in Los Angeles, but its recent growth, and the rising comorbid complexities of undertreated medical, mental health, and substance use disorders facing this population, coupled with its disproportionate reliance on public social services, make homelessness a public health emergency. Homelessness not only threatens the wellbeing of those who are without a home but threatens the economic stability of impacted communities as well.

Los Angeles (LA) County currently has the second-highest number of homeless residents in the United States, second only to New York City.<sup>i</sup> The homeless count in LA County increased by 42% from 38,700 individuals to over 55,000 between 2010 and 2017.<sup>ii</sup> This was lessened only slightly in the 2018 count with 52,765 individuals, of which 39,000 people live outside, representing the first decrease in four years.

In recognition of these dire trends, on December 6, 2016, the LA County Board of Supervisors unanimously voted to declare homelessness an emergency in LA County.<sup>iii</sup> The declaration noted that homelessness in LA County is pervasive and growing in severity, endangering the lives of tens of thousands of LA County residents, and threatening the economic stability of the region by burdening the medical and social services safety net infrastructure.

In addition, on October 30, 2018, the LA County Board of Supervisors declared a shelter crisis in unincorporated areas of the County, mirroring Mayor Eric Garcetti's April 17, 2018 shelter crisis declaration for the City of Los Angeles. These declarations describe the pressing need to quickly build new housing units at scale to support the homeless and housing insecure.

## **How Homelessness Hurts Individuals**

The United Nations recognized the right to “adequate housing” as a fundamental human right almost three decades ago.<sup>iv</sup> It should be no surprise, therefore, that when individuals lack a consistent and secure place to live and sleep, many detrimental and cascading effects follow – chief among these effects is poor health.

More than 80% of homeless people have at least one chronic medical issue, including high blood pressure, heart disease, diabetes, and infectious diseases.<sup>v</sup> Over half of homeless individuals have a mental health condition such as schizophrenia, bipolar disorder, post-traumatic stress disorder and others, and up to an estimated 60% have substance use disorder.<sup>v</sup>

Substance use disproportionately impacts the homeless and is in many cases their primary reason for homelessness. A survey by the United States Conference of Mayors found that 68% of cities reported that substance abuse was the single largest cause of homelessness for single adults.<sup>vi</sup>



And two-thirds of homeless individuals report that drugs and/or alcohol were a major reason why they became homeless in the first place.<sup>vi</sup>

Without treatment, many of these individuals will succumb to their mental illness and addictions, enrolling them into a justice system that all too often criminalizes poverty.

Besides their health, the homeless are forced to constantly worry about their environment and physical safety. In one study of homeless individuals, 32% of women, 27% of men, and 38% of transgendered individuals reported physical or sexual assault in the previous year.<sup>vii</sup> Among homeless women with mental illness, the lifetime risk of violent victimization is 97%.<sup>viii</sup>

Meanwhile, without a permanent address or ready access to a birth certificate and identification, things previously taken for granted suddenly become large barriers when seeking services, benefits, and jobs. Imagine the diabetic patient who needs to keep his insulin refrigerated or the person with sleep apnea who needs to plug in his breathing machine at night. Simply taking a pill twice a day suddenly becomes a logistical challenge. Our interim housing continuum under the Department of Health Services' Housing for Health division has provided a stable, clinically enriched environment where individuals with chronic disease who face homelessness can safely access the care they need and the environment required to manage their health conditions.

With these constant comorbid burdens, stressors, and barriers to assistance, it's no wonder that the average lifespan of a homeless individual is up to 36 fewer years and the mortality rate four to nine times higher than the housed general population.<sup>ix,x</sup> Further, a ten-year study in Boston found that homeless individuals who sleep outside unsheltered have a three-fold increased mortality rate compared to the homeless primarily sleeping in shelters, and a ten-fold increased mortality rate compared to the Massachusetts population.<sup>xi</sup>

According to the LA County Medical Examiner, homeless deaths in the County have continuously risen from 407 in 2012 to 899 in 2018. The majority of these deaths are accidental, with drug overdose being the overwhelmingly most common mechanism. To any health care practitioner, these statistics signal a community emergency that needs immediate attention.

### **How Homelessness Hurts Communities**

Rising numbers of chronically homeless affect our communities in numerous ways, especially straining publicly-funded services. Homeless individuals use the emergency room three times more and are hospitalized five times more than housed individuals.<sup>xii,xiii</sup> 80% of these expensive emergency room visits among the homeless are for an illness that could have been treated with regular primary care for far cheaper.<sup>xiv</sup>

In the process, these frequent visits tie up and overwhelm local 911, Police, Fire, and EMS systems. Once hospitalized, often in County safety net hospitals, the care rendered will go unreimbursed if the individual lacks health insurance, adding to the financial strain on already stretched safety net systems.

According to a 2015 Los Angeles report, at least 15 of the city's agencies engage with the homeless population, some at large cost.<sup>xv</sup> For example, public health departments scrambled to contain last year's hepatitis A outbreak among homeless individuals in California, as this population lacks adequate access to clean water and facilities for hygiene maintenance. Add in

the economic impact on community property values, lost workforce productivity, and the increased burden on local jails, which must provide health services without the benefit of leveraging federal funds available when such services are provided in the community, and the costs continue to multiply.

### **Current Progress Sticking Points**

While the aforementioned challenges are staggering, our efforts within health services have led to some early successes. Studies nationally and locally, including a 2017 RAND Corporation study which looked at the Department of Health Services Housing for Health program, have shown that for homeless individuals who have been frequent users of acute care services within Los Angeles, utilization drops once housed.<sup>xvi</sup> Essentially, housing helps stabilize an individual's social environment and reduces the stressors of getting through the day, allowing more regular and appropriate engagement in life-sustaining choices such as visiting a primary care physician or mental health provider.

One critical issue is that Los Angeles lacks a sufficient set of facilities which allow clinically complex individuals to come off the streets into interim housing and seek care when they are ready. Although some facilities are open extended hours, and even 24 hours a day, they often lack the clinical services to help support a client through their initial intensive needs. Facilities that do have the clinical capability to serve complex clients, keep normal business hours or have other restrictions that limit their accessibility, such as bans on pets, a lack of secure storage space, prohibition of tent or car habitation, and an absence of gender-mixed housing that allow partners to stay together.

### **How *Safe Landing* Addresses the Emergency**

The emergent morbidity and mortality threat of the opioid epidemic and undertreated complex medical and mental health issues facing the homeless, supported by official declarations of both homelessness and shelter crises in Los Angeles County, are emergencies involving clear and imminent danger, and the proposed ***Safe Landing*** project is necessary to prevent and/or mitigate these emergencies.

The creation of ***Safe Landing***, proposed in West Athens, would deliver immediate interim housing for over 300 individuals and provide comprehensive on-site health, mental health, and case management services 24 hours a day, 7 days a week, free of the restrictions noted above. Staffed around the clock, many with the lived experience of previously being homeless, this site would also provide meals, areas to sleep, transportation to appointments, group counseling, and numerous other services and activities. This site would immediately beneficially impact homelessness in the surrounding area, in which 700 unsheltered individuals live within a two-mile radius.

In addition, substance use disorder treatment, including the use of Medication-Assisted Treatment (MAT) and the opioid reversal agent naloxone, have saved lives. Access to these services, however, is still being expanded and few services are co-located with housing, forcing individuals to choose between searching for housing and consistent treatment. ***Safe Landing*** would provide on-site substance use disorder treatment and counseling, which would help

prevent opioid overdoses and decrease deaths, risks which have a high probability of imminently occurring if this project and others like it are not built quickly.

If we want to meaningfully and sustainably intervene in the emergencies happening to disease-burdened individuals living on the streets, sites like *Safe Landing*, which are open 24/7, with low barriers to entry, complete with robust wraparound clinical and social services must be created and created quickly.

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**Dr. Mark Ghaly** is a primary care pediatrician currently serving as the Director of the Los Angeles County's Chief Executive Officer's Office of Health and Social Impact. After completing medical school and his public health degree at Harvard Medical School and Harvard's School for Public Health, Dr. Ghaly completed his residency at University of California, San Francisco. Following his training, Dr. Ghaly became the medical director for Southeast Health Center in San Francisco where he provided direct patient care and managed the clinic as well as the weekly mobile homeless health care clinic that operated in the Bayview Hunters Point community. In 2011, Dr. Ghaly moved to Los Angeles to become the Los Angeles County Department of Health Service's Deputy Director over Community Health and Integrated Programs. In this role, Dr. Ghaly helped create and build up Housing for Health. Housing for Health has over the past 7 years become an essential direct service provider and programmatic leader for individuals with significant clinical conditions who face and experience homelessness. The Housing for Health team has built an impressive portfolio of services including 1800 interim housing beds including stabilization and recuperative care beds, began the County's first Sobering Center in the Skid Row area of Downtown Los Angeles, opened and directly operates a primary care clinic specializing in serving individuals facing homelessness and those recently housed in permanent supportive housing, created and manages contracts for over 50 multidisciplinary outreach and engagement teams working throughout the County with individuals facing homelessness, and housed in permanent supportive housing over 6000 individuals with complex clinical issues. This experience as both a direct service provider and a leader in homelessness services and housing qualify Dr. Ghaly to provide the following justification.

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<sup>i</sup> <https://www.dailynews.com/2018/12/17/hud-report-l-a-county-has-second-highest-homeless-population-of-u-s-regions/>

<sup>ii</sup> <https://www.lahsa.org/documents?id=2059-2018-greater-los-angeles-homeless-count-presentation.pdf>

<sup>iii</sup> <http://ridley-thomas.lacounty.gov/index.php/board-declares-emergency-and-places-homeless-initiative-on-ballot/>

<sup>iv</sup> [https://www.ohchr.org/Documents/Publications/FS21\\_rev\\_1\\_Housing\\_en.pdf](https://www.ohchr.org/Documents/Publications/FS21_rev_1_Housing_en.pdf)

<sup>v</sup> <http://www.nhchc.org/wp-content/uploads/2014/06/chronic-disease-combo-hch-conf-es.pdf>

<sup>vi</sup> <https://www.nationalhomeless.org/factsheets/addiction.pdf>

<sup>vii</sup> [https://www.nsvrc.org/sites/default/files/NSAC11\\_Handouts/NSAC11\\_Handout\\_With\\_Statistics.pdf](https://www.nsvrc.org/sites/default/files/NSAC11_Handouts/NSAC11_Handout_With_Statistics.pdf)

<sup>viii</sup> <https://endsexualviolencect.org/resources/get-the-facts/homelessness/>

<sup>ix</sup> <http://www.nhchc.org/wp-content/uploads/2011/10/Premature-Mortality.pdf>

<sup>x</sup> <https://www.cdc.gov/features/homelessness/index.html>

<sup>xi</sup> <https://jamanetwork.com/journals/jamainternalmedicine/article-abstract/2687991>

<sup>xii</sup> <https://www.hcup-us.ahrq.gov/reports/statbriefs/sb229-Homeless-ED-Visits-2014.pdf>

<sup>xiii</sup> <http://www.hpoe.org/Reports-HPOE/2017/housing-role-of-hospitals.pdf>

<sup>xiv</sup> <https://www.greendoors.org/facts/cost.php>

<sup>xv</sup> <http://www.auditor.ca.gov/reports/2017-112/summary.html>

<sup>xvi</sup> [https://www.rand.org/pubs/research\\_reports/RR1694.html](https://www.rand.org/pubs/research_reports/RR1694.html)

## PROFESSIONAL EXPERIENCE

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### **DIRECTOR, CENTER FOR HEALTH & SOCIAL IMPACT, LOS ANGELES COUNTY (LAC) CHIEF EXECUTIVE OFFICE**

(April 2018 - present)

Recruited to create a new Center to support innovation, initiation, integration and improvement of programs for vulnerable populations. Initiatives include:

- ❖ Housing for All: Expand the mission and reach of Housing for Health (see below) to create interim and permanent housing options for all Angelenos experiencing or at risk of homelessness.
- ❖ LAC System of Care: Develop a road map, infrastructure, and funding for a full continuum of services across institutions and community-based sites that serve individuals with serious clinical needs who are frequent users of public services.
- ❖ Jobs for All: Create and implement strategies to increase the availability of County and County-funded jobs for individuals in targeted populations including those formerly incarcerated and/or homeless.
- ❖ Vulnerable Children/Youth: Develop initiatives across County departments to address upstream factors which result in children in the child dependency system becoming at risk for incarceration or homelessness.

In addition to the initiatives above, continue to supervise the following County programs: Correctional Health Services, Office of Diversion and Reentry, Housing for Health and Whole Person Care.

### **CHIEF DEPUTY DIRECTOR; DIRECTOR, COMMUNITY HEALTH & INTEGRATED PROGRAMS, LAC DEPARTMENT OF HEALTH SERVICES (DHS)** (2011 – April 2018)

As a direct report to the DHS Director, managed portfolio of cross-cutting, innovative programs and initiatives that moved beyond the walls of the traditional hospital and clinic and provided care where it is most needed, including jails, juvenile detention facilities, locked mental health facilities, the streets, and patients' homes. The portfolio focused on service enhancements and program innovations; financing schemes under Medicaid; workforce development; case and care management programs; and IT platform development.

#### **Core Responsibilities:**

##### *Housing & Homelessness*

- ❖ Created and supervised DHS' Housing for Health Division to move clinically complex individuals experiencing homelessness into permanent supportive housing with access to appropriate clinical services.

##### *Health & Justice*

- ❖ Supervised Juvenile Court Health Services which provides health services to 1400 youth in the LAC juvenile detention system.
- ❖ Created and supervised DHS' Correctional Health Services (CHS) to provide comprehensive, integrated health services to LAC's 18,000 jail inmates.
- ❖ Created and supervised the LAC Office of Diversion and Reentry to create pathways and resources to transition individuals with serious mental health and substance use disorders out of jail and into community-based housing and clinical services.

##### *Healthcare Delivery System*

- ❖ Oversaw County health services on the Martin Luther King, Jr., Medical Campus, in South Los Angeles.
- ❖ Created and supervised the LAC Whole Person Care program, a component of the California Medicaid 1115-Waiver
- ❖ Launch the Drug Medicaid Organized-Delivery System (ODS) in Los Angeles County.

- ❖ Oversaw administrative functions and coordinated clinical activities across DHS' three hospitals providing acute (inpatient and emergency department) psychiatric services.
- ❖ Oversaw the DHS Medical Hub System which provides health care to children in the dependency system.
- ❖ Created and oversaw the Care Connections Program (CCP), DHS' first Community Health Worker program.

**Budget:** Total annual budget across these programs: approximately \$1.2 billion

### **Major Accomplishments:**

#### *Housing & Homelessness*

- ❖ Housed over 5600 clinically complex homeless individuals in permanent supportive housing since 2013.
- ❖ Created a 1400-bed Interim Housing system in LAC which includes stabilization and respite housing options.
- ❖ Housed over 4000 persons through creation of California's largest local rental subsidy program, the Flexible Housing Subsidy Pool.
- ❖ Created and deployed 35+ multidisciplinary homeless street outreach teams.
- ❖ Opened LAC's first Sobering Center – 50-beds located in the Skid Row area of Downtown LA.

#### *Health & Justice*

- ❖ Transitioned the nation's largest jail health delivery system from a siloed set of services operated separately by the Los Angeles Sheriff's Department and the Los Angeles County Department of Mental Health to a fully integrated County CHS unit housed within DHS. This included moving roughly \$350m of annual budget and 2400 County staff.
- ❖ Established a new care and staffing model for CHS which focuses on team-based care, primary care instead of episodic care, enhanced mental health services, in-custody substance use disorders treatment services, and discharge planning and navigation upon reentry.
- ❖ Established LAC's first in-custody Naloxone Distribution and Training Program.
- ❖ Helped negotiate, and now oversee, LAC's Settlement Agreement with the U.S. Department of Justice regarding access and quality of mental health care in the LA County jails.
- ❖ Opened a new 18-bed inpatient psychiatric unit at Olive View Medical Center to provide care to individuals on involuntary hold status who are diverted from the LAC jail.
- ❖ Established California's first Felony Incompetent to Stand-Trial (IST) Community-Based Restoration Program which has led to a 20% reduction of individuals in LAC jail awaiting a State Hospital bed since June 2018.
- ❖ Built California's largest Misdemeanor IST Community-Based Restoration Program.
- ❖ Diverted over 2100 individuals from LAC jail and into community-based housing and treatment since 2016.
- ❖ Support roughly 600 individuals exiting LAC jail per month with necessary reentry services.

#### *Healthcare Delivery System*

- ❖ Established *Whole Person Care – Los Angeles (WPC-LA)*, a \$280m annual, 5-year, program as a component of the 2015-2020 California 1115 Medicaid Waiver.
- ❖ Served over 50,000 individuals in WPC-LA across seven high-risk target populations in 16 different programs since 2016.
- ❖ Successfully launched all facets of the LAC Drug Medicaid Organized Delivery System on-time in 2017.
- ❖ Led the County team that opened the new 131-bed, non-profit Martin Luther King, Jr., Community Hospital as a Public-Private Partnership; launched additional campus-based support services including crisis mental health, respite care, and enhanced outpatient services.
- ❖ Improved the quality and productivity of health care services at the DHS-operated Martin Luther King, Jr. Outpatient Center with nearly 200,000 outpatient visits and surgeries annually.
- ❖ Trained and hired over 100 Community Health Workers and Promotoras to work in clinical and community-based settings.
- ❖ Provided executive oversight of key DHS capital projects:
  - MLK, Jr. Community Hospital: Renovation of former Trauma Tower into 131-bed community hospital with emergency department and intensive care unit.
  - MLK, Jr. Outpatient Center: New construction of four-story, 200,000+ square foot outpatient and surgical center.



- LAC Consolidated Correctional Treatment Center: Pre-construction and design activities for the planned 3885-bed correctional treatment facility to replace LAC Men's Central Jail.
- ❖ Provided executive oversight of design and implementation of key County IT Platforms
  - SAGE – designed, developed and launched LAC's substance use disorder medical record system built by Netsmart.
  - CHAMP – designed, developed and launched Phase I of LAC's electronic social services record to support implementation of housing, reentry, and Whole Person Care

***Attending Physician, Direct Clinical Care within DHS Facilities (various dates from 2011 – present)***

- ❖ Cared for patients at Olive View Medical Center in urgent care one half-day each week (2018 through present).
- ❖ Juvenile Court Health Services: Cared for patients in urgent and follow-up clinics weekly at Central Juvenile Hall, LAC's largest juvenile detention facility (2011-2018).
- ❖ Provided primary pediatric care to a panel of children in out-of-home placement within the MLK Hub clinic (2012-2017).
- ❖ Inpatient Attending: Provided inpatient ward attending coverage at LAC+USC Medical Center (2013) and Olive View-UCLA Medical Center (2017).

**MEDICAL DIRECTOR, SOUTHEAST HEALTH CENTER, SAN FRANCISCO DEPARTMENT OF PUBLIC HEALTH (DPH)**  
(2006 - 2011)

Oversaw day-to-day clinic operations, strategic planning and quality improvement activities for all service lines including primary care, urgent care, dental, optometry, podiatry, and behavioral health for County-operated community clinic located in Bayview Hunters Point.

- ❖ Provided clinical and operational oversight for 20,000 annual visits.
- ❖ Led clinic's management team responsible for supervision of 40+ employees.
- ❖ Provided clinical care for a panel of over 800 patients between ages 0 – 24.
- ❖ Supported the ongoing development and growth of the 3<sup>rd</sup> Street Youth Center and Clinic by providing staff support, clinical oversight and direct provision of medical care on a weekly basis.
- ❖ Led and/or developed many community-based initiatives including: Southeast Food Access (SEFA) workgroup, violence and asthma prevention initiatives
- ❖ Participated in planning discussions with city leaders on issues at the Hunter's Point Shipyard.

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**EDUCATION AND TRAINING**

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**University of California, San Francisco**

**2002 - 2005**

*Intern and Resident, Pediatrics and Pediatric Leadership of Underserved (PLUS)*

- ❖ Intern teaching award, 2003
- ❖ Senior Resident teaching award, 2005
- ❖ Resident lead for creation of PLUS track residency training program and part of the inaugural PLUS class of residents, 2004
- ❖ International clinical elective in Uganda, 2004
- ❖ Began, in partnership with community members and community based organizations, the Bayview Healing Arts Center (now the 3<sup>rd</sup> Street Youth Center and Clinic) in the Bayview Hunters Point community, 2005

**Harvard Medical School**

**1997 - 2002**

*M.D.*

- ❖ Massachusetts Medical Society Medical Student Award/Scholarship, 2002
- ❖ Primary Care Scholarship Award, 2002
- ❖ Special projects
  - Began "Boston City Voices", a youth violence prevention group, under Partners in Health, Roxbury, MA, 1998

- ❖ Completed additional year abroad, 2000-01
  - Assisted in design and start-up of a home for street children in La Paz, Bolivia
  - Investigated health hazards faced by child laborers in Southeast India

**Harvard School of Public Health**

**2001 - 2002**

*M.P.H., Public Policy and Health Care Management*

- ❖ Completed practicum project on Children's Mental Health Services in MA

**Brown University**

**1992 - 1996**

*B.A., Biological Science; B.A., Biomedical Ethics*

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**CURRENT COMMUNITY ACTIVITIES**

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**LAC+USC Hospital Foundation and LAC+USC Wellness Center**

- ❖ Board Chair **2014 - present**
- ❖ Board Member **2013 - present**

**Languages:**

- ❖ Arabic, basic language skills
- ❖ Spanish, medical and conversational